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February 22, 2019

Re: Comments on the Sunset Area Plan and Placer Ranch Specific Plan (SAP/PRSP) DEIR

Dear Ms. Herrington,

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for a program-level analysis of the Sunset Area Plan (SAP) Update and a project-level analysis of the Placer Ranch Specific Plan (PRSP). This cover letter summarizes the City's areas of concern. More detailed comments are included as Attachment 1 to this letter.

The City would like to reemphasize its specific support of a university project in South Placer County and of the PRSP development concept in general. Throughout the process of developing the specific plans, commenting on the Notice of Preparation, and providing feedback on the Administrative Draft DEIR, the City has repeated its commitment to working in cooperation with Placer County on this important project. However, the City had previously requested that the description of the impacts to the City—and the mitigation measures to reduce or avoid those impacts—be fully disclosed and discussed in advance of DEIR publication, so that the measures identified in the DEIR are fully enforceable and agreed to by the City. Unfortunately, the City's concerns have not been adequately addressed. As such, it is the City's obligation to strongly express its concerns in this DEIR comment letter, as there will be significant environmental effects caused by the project in Roseville which remain unmitigated despite the availability of feasible mitigation measures.

The City has found the analysis and mitigation contained in the DEIR to be inadequate. The DEIR should be revised and recirculated to address the concerns outlined in this letter, and should also be recirculated with the fiscal analysis and proposed development agreements for the project, which should include the requirement to implement applicable mitigation measures identified in the DEIR. The City respectfully requests the opportunity to develop mutually-agreeable, adequate mitigation and the opportunity to review and provide input on the fiscal analysis and development agreements, prior to the recirculation of the DEIR.

The County published a staff report which listed areas of controversy and held a public hearing on the DEIR on February 14, 2019, at which a City representative provided oral comments. Of the twenty areas of known controversy, the City is particularly concerned with twelve, as follows:

- **Odor-related impacts:** The project includes an amendment to the Placer County General Plan's Solid Waste Public Facilities Buffer Standards to reduce the residential buffer zone of the landfill from one mile to 2,000 feet (or 1,000 feet on a case-by-case basis). Placer County General Plan Policy 4.G.11 further states: "When considering land use changes in the vicinity of a landfill operation, the County shall consider the landfill as the dominant land use in the area." The DEIR analysis acknowledges that reducing the landfill buffer could cause odor impacts and lead to incompatible land uses, which would create a need for solutions which are extremely costly or even infeasible, but concludes that because Placer County does not control the landfill, mitigation is infeasible. This conclusion is incorrect.

Payment of fair share fees is a feasible mitigation measure which would allow the landfill to make needed modifications, and should have been examined in the DEIR.

In addition, the project analysis of landfill impacts is limited to an analysis based on the existing condition. However, landfill expansion is a reasonably foreseeable project, and conceptual layouts for the expansion have been available since 2016 (see the Western Placer Waste Management Authority website: <https://www.wpwma.com/>) but the DEIR analysis does not examine the impacts of the project compared to the expansion. The DEIR must include this cumulative analysis in order to comply with CEQA; please revise the DEIR to include this cumulative analysis.

- **Transportation impacts:** The City's General Plan Circulation Element, page III-33, includes Level of Service Policy 1, which requires a Level of Service standard of "C" at a minimum of 70% of all signalized intersections and roadway segments. According to the DEIR, the project will cause PM peak hour operations in Roseville to drop from 84% to 68% of intersections operating at Level of Service C (LOS C) or better. As a result, the proposed project will have a significant traffic impact and it will cause the City's traffic network to be inconsistent the City's General Plan. Furthermore, the DEIR identifies more than 40 mitigation measures which are not within the City's Capital Improvement Plan (CIP); therefore, there is no substantial evidence that the County has committed to ensuring that the proposed mitigation measures are fully enforceable. This is a significant concern to the City and is not adequately addressed within the DEIR.

Furthermore, Mitigation Measure 4.14-3 and 4.14-4 describe a fair-share fee program to offset the impacts to City of Roseville facilities that is not well-defined. The City has been requesting that the County work cooperatively with the City to craft mutually agreeable transportation mitigation measures since issuance of the NOP. These measures could have been better defined for review by the public by the time of publication of the DEIR, but the County elected not to coordinate acceptable traffic mitigation measures. The City is very concerned that the language presented in the DEIR about negotiating in "good faith" within a "reasonable time" does not commit the County to specific, feasible actions to offset impacts to City facilities and is, therefore, not enforceable mitigation.

- **Foothills Boulevard:** The DEIR fails to disclose that the Foothills Boulevard extension is a required project improvement, both on- and off-site. This critical roadway needs to be identified as a project responsibility and evaluated at a project-level to ensure that the improvements are feasible. The DEIR must analyze the entire off-site portion of the proposed Foothills Boulevard, which is a reasonably foreseeable improvement. Failure to include the project-level analysis in the DEIR jeopardizes the ability to obtain the necessary funding and right-of-way dedications. The DEIR indicates that 50% of the PRSP could be developed before this connection is needed and that 75% of PRSP would need to be built before the necessary funding is available. The City takes strong exception to the assessment of need. As explained in more detail in Attachment 1 of this comment letter, the impacts to Fiddymont Road and Woodcreek Oaks Boulevard are substantially underestimated in the modeling and therefore the Foothills Boulevard extension may be essential to mitigating impacts to Roseville roadways. As a result, the DEIR analysis of when this required facility will be necessary is significantly misstated. This improvement will be needed significantly earlier than indicated in the DEIR. Additionally, the City takes issue with the fact that the DEIR does not speak directly to the timing and funding of the roadway connection and bridge construction costs.
- **Public services:** The analysis has deferred detailed consideration of impacts on police/emergency services, fire services, and library services. All of the public service analysis in the DEIR acknowledges that the project will increase demands on these public services, but it does not identify locations for new or expanded facilities or the environmental impacts of such facilities. The mitigation does not include triggers for the timing of construction or include any performance standards. The project as proposed is very likely to result in increased demands on City services and require facility

expansions within Roseville. Roseville residents recently passed a sales tax measure (Measure B) to preserve—and in some cases restore—public service levels within the City. As currently proposed, the project would create an unfunded increase in City service demands; Roseville residents should not have to pay for services and expanded facilities required to support the project. The DEIR analysis and mitigation should be revised to ensure the project will meet anticipated service demands, in order to avoid impacts to City services and facilities.

- **Public recreation and parks:** The analysis in the DEIR has not demonstrated that all required parkland is being provided to support the entire project. The analysis provides parkland credit to private facilities which are not publicly-accessible, and does not include the residential units contained within the SAP in its calculations. It also does not provide sufficient recreation facilities to meet County standards. All of this will result in the increased use of City park facilities, which will contribute to substantial physical deterioration of City park sites and the need to make physical improvements, without adequate funding sources.
- **Utilities Distribution and Treatment Capacity:** The DEIR fails to consider cumulative impacts related to both the landfill and wastewater impacts. Regarding the landfill, the DEIR does not analyze the proportional increase in solid waste generated by the Project and by full build out of the SAP, and its effects on the life-span of the landfill. Regarding wastewater, the DEIR compares the projected project wastewater flows to the current Pleasant Grove Wastewater Treatment Plan flows, rather than to the build-out flow conditions. As a result, the complete project impacts to the treatment plant are undisclosed in the DEIR.
- **Stormwater drainage facilities:** Implementation of the project would require construction of the planned Pleasant Grove Retention Facility in the City of Roseville, as stated on multiple pages within the DEIR (e.g. DEIR page 4.9-28). However, Mitigation Measure 4.9-1b is not sufficient, because it does not require payment of fair-share fees to the City, establish or discuss operational and maintenance funding, and does not reference the Pleasant Grove Retention Facility.
- **Conflicts with planned facilities:** As stated previously, the DEIR does not examine the project in light of the planned landfill expansion, and it also does not require right-of-way dedication for Placer Parkway.
- **Aesthetic impacts:** This is a significant new development area, which allows up to 150-foot-tall structures in the Innovation Center and up to 225-foot-tall structures in the Commercial Recreation, Hotel, and Hotel Resort land uses. The City of Roseville shares three miles of common border with the project area, but despite this fact the analysis in the DEIR only includes a single vantage point in the City, which is taken from Fiddymont Road at one limited angle of view. No photosimulations are provided, which makes it difficult to understand the scope of the impacts. The DEIR includes images from only a handful of viewing locations, which are not representative of actual viewpoints observed by the most affected viewer groups; has provided photos which are of limited scope/direction and do not represent the actual view of a person standing at the viewpoint; and have been taken from locations which ensure there are intruding visual encroachments in the foreground that distorts the actual view which would be experienced.
- **Project phasing and timeline:** The City is deeply concerned about the timing of mitigation measures in relationship to the timing of project phasing and construction. Many of the mitigation measures do not include development triggers or other timing mechanisms to ensure that needed mitigation occurs before or at the time of project impacts.

- **Noise:** The DEIR includes mitigation related to the City's Roseville Power Plant 2, but this mitigation does not include specific performance criteria to ensure that adequate sound attenuation would be achieved.

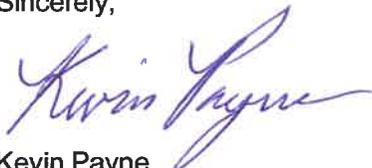
In addition to the concerns identified regarding areas of known controversy, the City has serious concerns about the cumulative impacts analysis of the project. Page 4-1 of the DEIR states that two levels of analysis are provided: project-level for the PRSP, and program-level for the SAP and University. Under the guise of providing a "program-level" analysis, this DEIR defers required analysis of known project details to a later date. While citing California Environmental Quality Act (CEQA) Guidelines Section 15168(a) to support this approach, the DEIR neglects to account for Section 15168(b), which states that the program EIR can "provide an occasion for a **more exhaustive consideration of effects and alternatives** than would be practical in an EIR on an individual action," and "**ensure consideration of cumulative impacts** that might be slighted in a case-by-case analysis." [emphasis added] The Program EIR option does not exist as a means of avoiding detailed analysis, as this EIR seems to imply; it exists as a means to streamline later analysis of subsequent actions by providing a comprehensive and connected analysis.

As an example, although modifications of the SAP land uses are proposed as part of this project, and the traffic generation of those uses can be determined at this time, the cumulative traffic study does not include intersection analysis of full project buildout. This avoidance of a complete analysis of the proposed land use is not consistent with the intent or purpose of a program-level analysis, and is an improper deferral. The County is proposing to adopt a land use plan without analyzing the impacts of the whole of the project. Either these complete project and cumulative impacts must be examined, or the portions of the project which are "well beyond the planning horizon" (DEIR page 4-1) should be excluded from the project.

As previously stated, the City supports the concept of development within the Placer Ranch Specific Plan area, and in fact—as the County is aware—was once the lead agency for development in this area. Acting as Lead Agency, the City prepared a draft Specific Plan and published a Notice of Preparation (NOP), to which the County responded. The City's expressed concerns about the current DEIR analysis are consistent with those which were once strongly expressed in the County's letter (dated January 26, 2015; Attachment 2) on the City's NOP.

Based on these known areas of controversy, it is clear that the significant environmental effects of the project have not been adequately addressed in the DEIR. The cumulative analysis is insufficient, and the specific comments included in Attachment 1 of this letter, require that the County revise and recirculate the DEIR to address the City's concerns. Recognizing the regional benefit of the project, the City offers its full participation in the development of mutually-agreeable, adequate mitigation measures. These measures need to be supported by a fiscal analysis and development agreements preserving Roseville's current and projected public service levels, which would significantly reduce the project's impacts to the residents of Roseville and South Placer County. It is for these reasons that the City requests revision and recirculation of the DEIR. If you have any questions regarding the City's comments on the DEIR, please contact Senior Planner Lauren Hocker at (916) 774-5272 or via email at lhocker@roseville.ca.us.

Sincerely,



Kevin Payne
Assistant City Manager

Attachments:

Attachment 1 – Detailed City Comments on DEIR

Attachment 2 – Placer County Comments on the City's NOP

Attachment 3 – Pages from *City of Roseville Open Space Preserve Overarching Management Plan*

Attachment 4 – Riley Library Borrower Map

Cc:

Dominick Casey, City Manager, City of Roseville

Mike Isom, Development Services Director, City of Roseville

Greg Bitter, Planning Manager, City of Roseville

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Crystal Jacobson, Principal Planner, Placer County

ATTACHMENT 1

The City of Roseville has the following comments on the DEIR, which consist of general comments, followed by more specific comments on chapters and sections of the DEIR, as indicated below.

General Comments

1. On Page 4-1, the DEIR states that it provides two levels of analysis: project-level for the PRSP, and program-level for the SAP and University. For the “program-level” analysis, this DEIR defers required analysis of known project details to a later date. While citing CEQA Guidelines Section 15168(a) to support this approach, the DEIR neglects to account for Section 15168(b), which states that the program EIR can “provide an occasion for a **more exhaustive consideration of effects and alternatives** than would be practical in an EIR on an individual action,” and “**ensure consideration of cumulative impacts** that might be slighted in a case-by-case analysis.” [emphasis added] The purpose of a Program EIR is not to avoid detailed analysis, as this DEIR seems to imply. Rather, the purpose is to allow streamlining later analysis of subsequent actions by providing a comprehensive and connected analysis. However, this analysis has done the opposite.

As an example, although modifications of the SAP land uses are proposed as part of this project, and the traffic generation of those uses can be determined, the cumulative traffic study does not include intersection analysis of the complete project buildout. This avoidance of a complete analysis of the proposed land use is not consistent with the intent or purpose of a program-level analysis, and is an improper deferral. The County is proposing to adopt a land use plan without having analyzed the impacts of the entire project. Either these complete impacts must be examined, or the portions of the project which are “well beyond the planning horizon” should be excluded from the project.

2. As a general rule of practice, legally adequate mitigation measures must:
 - Be quantifiable or sufficiently specific to demonstrate how the impact will be reduced;
 - Be fully enforceable through conditions or other binding agreements; and
 - Not defer formulation of measures until some future time, but may specify performance standards.

In addition, the impacts of the mitigation measures themselves should be analyzed.

Throughout the document, impacts to the City of Roseville are identified, but the mitigation measures simply state that the City of Roseville would be responsible for mitigation and the County will “coordinate with the City.” As discussed below, specific mitigation measures for impacts to Roseville must be addressed and analyzed in the DEIR and not deferred.

Chapters 1- 3 (Introduction, Summary, Project Description)

3. Page 2-3, Required Permits and Approvals. Please add to the list an agreement with the City of Roseville delineating fair-share obligations for impacts to roadways within Roseville
4. Page 2-64, Impact 4.9-1, Mitigation Measure 4.9-1b. Development in Placer Ranch needs to fund additional design costs for any additional retention or detention storage needed to accommodate project stormwater runoff, as well as share in any associated costs including purchase, design, and

technical studies (including environmental review) for such storage. In addition, funding for future maintenance and operations is required. A City/County funding agreement is required prior to any development approvals being granted that would rely on this facility for mitigating stormwater impacts.

5. Page 2-73, Mitigation Measure 4.11-5a. Is rubberized concrete intended to refer to rubberized asphalt concrete (RAC)? In order to provide permanent sound reduction, a surface paved with RAC must be properly maintained (regardless of material, road noise increases as a road wears) and must be resurfaced with RAC, which is not a traditional paving material. The mitigation measure does not establish a process or program to ensure that regular maintenance and resurfacing with RAC occurs. Also, RAC should not be used on designated Truck Routes, because research has shown that it is much less effective at reducing noise from heavy vehicles (Report on the Status of Rubberized Asphalt Traffic Noise Reduction in Sacramento County, Bollard and Brennan, Inc, November 1999).
6. Page 2-79, Mitigation Measure 4.13-8. How will the increased maintenance cost to the City be mitigated? It is anticipated that additional maintenance will be incurred due to the large increase in traffic from Placer Ranch.
7. Page 2-80, Mitigation Measure 4.14-1a. The widening of Sunset Boulevard needs to occur before the first building occupancy.
8. Page 2-80, Mitigation Measure 4.14-1b. The extension and widening of Foothills Boulevard from the City of Roseville to the project boundary needs to occur concurrent with the initial specific plan infrastructure construction. This is important to ensure that traffic impacts on City roadways are minimized to the extent practicable.
9. Page 2-82, Mitigation Measure 4.14-3. The impact fees associated with mitigation for impacts within the City of Roseville should include the cost of timing new signals and retiming existing signals to accommodate the increase in traffic.
10. Page 2-91, Mitigation Measure 4.14-10. Fair share contributions to regional roadways should include Placer Parkway.
11. Page 3-4, Exhibit 3-3 *Project Area Map*. Please note that the Local Agency Formation Commission (LAFCO) approved the Amoruso Ranch Specific Plan for annexation into the City of Roseville in December 2018. Please update the City of Roseville boundaries accordingly.
12. Page 3-7. The Project Objectives for the PRSP indicate that an objective is to integrate plans for Placer Parkway, including establishing a corridor, and that the impacts of the facility were covered in a previously approved EIR. It should be noted that the previous program level EIR/EIS and project approval only established where the corridor would be located, but it did not include specifics such as information on facility performance standards, right-of-way needs, dedication of land, cross-sections, buffers, or interchange designs. While some of this information is contained within the PRSP and SAP, this information should at least be referenced within the DEIR. Otherwise, it appears that the project has not been designed to accommodate the facility, and it is unclear whether the physical impacts of facility construction have been analyzed. The Specific Plan also does not include a requirement that developers dedicate right-of-way, despite this language being included for other facilities. Please see the City of Roseville's Amoruso Ranch Specific Plan and EIR (SCH# 2013102057) for an example of the level of detail which should be included in the analysis.

13. Page 3-16. Housing in the Commercial and Industrial zones. The project includes a General Plan Amendment, which will allow up to 30 residential units per acre within the Entertainment Mixed-Use, Innovation Center, and Light Industrial land uses. However, while up to 30 units per acre would be permitted, Table 3-3 of Project 20-Year Development does not list any housing units within these land uses. Because residential development of 30 units per acre would be consistent with the proposed General Plan Amendment, the table should be amended to disclose the assumptions used in the DEIR analysis, particularly the traffic study, for the amount of residential development that could be built within these commercial areas as part of the project description.
14. Page 3-23, Exhibit 3-7, Circulation Diagram. The sections of Foothills Boulevard and Industrial Avenue within the City of Roseville should be widened to match the required lane geometry required just to the north of the City. This should be figured into the project cost and/or accounted for in the mitigation fee.
15. Page 3-26, Public Transit. Please provide more details regarding the Bus Rapid Transit requirements, including additional travel lanes, queue jump lanes, and transit stations. The need for additional right-of-way dedication should be defined.
16. On page 3-55 in the discussion of recycled water, the 1st Paragraph, 2nd Sentence states: "...Recycled water would be provided to the PRSP area using existing infrastructure from the City of Roseville Dry Creek and Pleasant Grove Wastewater Treatment Plants...". The City will need to determine (based on capacity) which plant or plants will deliver the recycled water. Therefore, it is premature to determine whether the Dry Creek and Pleasant Grove waste water treatment plant would be selected.
17. On page 3-55 Wastewater Treatment, Paragraph 1, the final sentence states that the PRSP will generate average dry weather flows of 1.99 MGD. Under the utilities section of the DEIR and in the master sewer plan, it is determined that the Project will generate 2.17 MGD. Please modify the sentence on page 3-55 to refer to 2.17 MGD.
18. Page 3-58, PRSP Drainage System. The fees collected by the County for the Pleasant Grove Retention Basin should consider all previous and future costs for property acquisition, environmental, design, construction, operation, and maintenance. Refer to prior comment 4.
19. Page 3-64 Foothills Boulevard (north). This section does not mention the facility improvements which would be needed within the City of Roseville to complete the extension of Foothills Boulevard. While Page 4-5 incorporates by reference the City's Foothills Business Park Annexation EIR for the extension of Foothills Boulevard, the scope of the extension project has changed in terms of both the number of lanes and the proposed alignment, so the analysis cannot entirely rely on this prior EIR and the DEIR analysis must be supplemented.
20. Page 3-69, Pleasant Grove Retention Facility, last paragraph. The fee program referenced in this section must ensure that a mechanism is in place to fund all associated costs for property acquisition, environmental review, design, construction, operation, and maintenance.
21. Page 3-79, Section 3.8. Foothills Boulevard is described as a four-lane arterial in this section. In other places in the DEIR, it is described as a six-lane facility. Please revise the DEIR to be consistent. This section should also include offsite mitigation improvements or appropriate fees for the widening of Blue Oaks Boulevard between Washington Boulevard and Foothills Boulevard, and the extension of a four lane Roseville Parkway between Washington Boulevard and Foothills Boulevard.

4.1 Aesthetics

22. The update to the Sunset Area Plan will substantially increase development potential over the existing Sunset Industrial Plan. This update would allow buildings up to 150 feet in height in the Innovation Center and 225 feet in height in the Commercial Recreation, Hotel, and Hotel Resort land uses. The City of Roseville shares three miles of common border with this development area, but despite this fact, the visual analysis in the DEIR only includes a single vantage point in Roseville, which is taken from Fiddymment Road at one limited angle of view. No photosimulations are provided, which makes it difficult to understand the scope of the impacts. The quality of a view, and the impact thereon, depends on the viewing location and the viewer group observing the view. However, the DEIR has included only a handful of viewing locations, which are not representative of actual viewpoints observed by the public in those locations; has provided photos which are of limited scope/direction and do not represent the actual view of people standing at the viewpoint; and have been taken from locations which ensure that there are intruding visual encroachments in the foreground, thereby distorting the actual view that would be experienced. These comments will focus on the viewpoint in the City of Roseville, to explain the concerns.

For example, Viewpoint 6 is taken from the end of Fiddymment Road, and is intended to represent the existing viewshed for City of Roseville residents. Rather than taking the photo from the end of the road or sidewalk, the photo has been taken from a position farther back, which ensures there are barricades, a light standard, and other encroachments within the foreground. The analysis states that the vividness, unity, and intactness of the view are low, though it provides very little explanation of this conclusion. The City would agree that the vividness of the view is low, but the conclusions regarding unity and intactness are based entirely on the assumption that the viewshed includes a foreground consisting of incompatible urban residential elements. Many citizens of the City of Roseville who live and travel on the southern boundary of the Project site have significant views of the Sierra Nevada mountain range. Future development will likely block these views. Therefore, the City disagrees that aesthetic impacts would be less than significant, for the reasons stated above.

4.3 Air Quality

23. Page 4.3-9, Exhibit 4.3-1 shows that even at a distance of one mile, there are already many odor complaints due to the landfill. Therefore, the DEIR needs to more fully discuss the impacts of reducing the land use buffer surrounding the landfill, which will exacerbate odor impacts.
24. Page 4.3-11 Future WRWMA Operations. This section discusses the future program, but doesn't carry the analysis through the document. The landfill expansion plans are a reasonably foreseeable project and, due to the County's proposal to amend its General Plan to reduce the land use buffer between future residential development and the landfill, would increase odor impacts and land use incompatibility related to odor (see comments on Section 4.10, below). The DEIR should analyze and disclose these reasonably foreseeable significant impacts.
25. Page 4.3-51 concludes that because odor impacts are subjective, mitigation is infeasible, but this is not accurate. Please refer to the City's comments on the land use compatibility analysis; the project should include payment of fair share fees, which is feasible mitigation.

4.4 Biological Resources

26. The DEIR does not mention potential impacts to City of Roseville wetland preserve areas adjacent to the project, and should be corrected to reflect the following:

- a. Show the adjacent City preserve areas graphically, specifically labeling the location of preserved wetlands.
 - b. The open space preserves are owned by the City, and the City could be liable to federal and State permitting agencies if any impacts occurred to protected wetlands on its property. Therefore, the County's mitigation measure should include a requirement to submit improvement plans to the City's Open Space Manager for review and comment prior to construction.
 - c. Onsite conservation plans should include a management approach for the locations where PRSP Area open space is contiguous with City of Roseville preserve areas. The City of Roseville recommends management consistent with the *City of Roseville Open Space Preserve Overarching Management Plan*.
 - d. The Project's Design Standards currently show that open fencing will be provided adjacent to the City's open space preserve. Development adjacent to the City of Roseville preserve areas should use masonry walls, or fencing otherwise designed to prevent impacts to the biological resources (e.g., unauthorized drainage, gates for accessing the open space for recreational use, dumping of yard waste, landscaping, etc.)
 - e. Project design must ensure that outfalls do not drain into City of Roseville preserve areas; therefore, the County's mitigation measure should specify this design requirement.
27. The potential for disturbance of biological resources in the adjacent City of Roseville preserve areas is high, and could be mitigated with measures including (but not necessarily limited to) the measures identified in Section 5.2 of the *City of Roseville Open Space Preserve Overarching Management Plan* (dated August 5, 2011), as included in Attachment 3, substituting the County as the overseeing agency.

4.9 Hydrology and Water Quality

28. The Hydrology and Water Quality chapter uses the term "future development" when describing all planned development in the SAP and PRSP. The City finds this terminology to be acceptable as long as the County agrees that the term "future development" is equivalent to "all SAP and PRSP development," all of which is reasonably foreseeable, such that no exclusions would occur.
29. Flooding of existing County properties, including the Gleason's and Amoruso Estates, are known areas of controversy, even during the two-year event. The DEIR does not address this issue. The DEIR should indicate whether the Project will create any increase in offsite flows that would impact these areas. This is of concern to the City, because flows from PRSP and SAP will be conveyed through the Amoruso and Creekview Specific Plan areas. Until the Amoruso and Creekview improvements are implemented, there may be additional impacts that are not currently identified in the DEIR. This should be addressed in the DEIR.
30. Page 4.9-28 indicates that implementation of the PRSP would require construction of the planned Pleasant Grove Retention Facility in the City of Roseville. However, Mitigation Measure 4.9-1b is not sufficient. The DEIR states that the City has already designed and approved, but has not yet constructed, the facility. It should be noted that the flows from this Project were not contemplated at the time the program-level City of Roseville Retention Basin Project (aka Pleasant Grove Retention Facility) EIR was certified (State Clearinghouse Number 2002072084). Additional environmental review will be required to construct the facility, particularly since DEIR Appendix C (Storm Drainage Report) indicates that the project will require expansion of this planned facility.

Mitigation Measure 4.9-1b discusses payment of fair-share fees to the County, but not to the City, and does not specifically reference the Pleasant Grove Retention Facility. Mitigation Measure 4.9-1b also does not acknowledge the fact that the project will result in a need for expansion of the planned facility, which should be reflected in the fair-share fee developed for the project. Please add the following language to make it clear that a fair-share development fee will be required and is a fully enforceable mitigation measure:

“The applicants for individual projects shall annex into the City of Roseville Regional Retention Basin fee district and pay the Pleasant Grove Drainage fee, which will be calculated to address the cost to accommodate the contribution of the Placer Ranch/Sunset Area project, to the City prior to the approval of each building permit. The fee shall be calculated to cover the fair share cost of retention and maintenance for that development’s portion of the Pleasant Grove Retention Basin Project at the Al Johnson Wildlife Area.

Development proposals in the PRSP and SAP shall demonstrate, through the preparation of technical engineering studies, that the increased volume of stormwater runoff from the proposed development can be accommodated in the approved City of Roseville Regional Stormwater Retention Facility. The results of the study shall be submitted to the City of Roseville Public Works department for review and concurrence. If expansion of the retention basin is required, the County shall work with the City to expand the retention facility as necessary, following appropriate environmental review, and funded through fair share contributions by SAP project developers at the building permit stage.”

31. Page 4.9-28. Lakeview Farms Retention Basin. The City suggests updating the statement “currently planned for construction in 2018,” date unless construction did start in 2018.
32. Page 4.9-31, *Mitigation Measure 4.9-1a: Submit final drainage report (Net SAP Area and PRSP Areas)* City recommends adding this statement at end of the paragraph “The final drainage report shall...address comments submitted during the public review period.”
33. Page 4.9-43. The City is concerned that the DEIR does not define and map the 100-year floodplain areas for the entire project area, instead deferring that information and analysis of impacts within the 100-year flood zone (Impact 4.9-5) to future, individual projects as part of improvement plan submittal. As a direct result of this deferral, the analysis concludes that the impact is potentially significant, because the ability to avoid floodplain impacts cannot be known with certainty (DEIR page 4.9-43: “However, at this stage of planning, the details of these measures have not been developed, and the County conservatively determines this impact to be potentially significant.” The City of Roseville is downstream in the Pleasant Grove Watershed, so any impacts due to increased development in the 100-year flood zone within the project area have the potential to cause downstream impacts in the City. The DEIR should be revised to disclose the location of the existing 100-year floodplain within the project area as a necessary prerequisite to considering the impacts of full buildout of the project.

As a result of the above concerns, the City also has questions and recommended changes to the proposed Specific Plan policies, which may help reduce or avoid this impact. Greater explanation should be provided for Policy PFS-5.6, which is unclear on the methodology that must be used to mitigate impacts (the policy states “unless another methodology has been agreed upon by Placer County.”) Policy NR-3.2 also should be revised to add a definition for “calculated 100-year-floodplain,” which should include a 100-year future, fully-developed floodplain.

34. Appendix D – Volumetric Retention Studies: ensure that the updated work that the County, City of Roseville, and consultants have produced up until October 2018 is incorporated into Appendix D and the DEIR.

4.10 Land Use

35. Page 4.10-14, Impact 4.10-2 discusses impacts related to consistency and compatibility with the Western Regional Sanitary Landfill (landfill), and concludes the impacts are potentially significant. The project includes an amendment to Placer County General Plan's Solid Waste Public Facilities Buffer Standards to reduce the residential buffer zone of the landfill from one mile to 2,000 feet (or 1,000 feet on a case-by-case basis). Existing Placer County General Plan Policy 4.G.11 further states: "When considering land use changes in the vicinity of a landfill operation, the County shall consider the landfill as the dominant land use in the area." The DEIR analysis acknowledges that the purpose of the existing buffer is to protect the landfill from pressures to implement odor control or reduction measures due to land use incompatibility. The analysis also acknowledges that a one-mile buffer is recommended by the Placer County Air Pollution Control District, though it does not mention that the same recommendation is contained within the California Air Resources Board "Air Quality and Land Use Handbook." Despite acknowledging these factors, and concluding on DEIR page 4.10-17 that the project would increase odor complaints and lead to pressure on the facility to implement additional odor control measures, the analysis concludes that because Placer County does not control the landfill, mitigation is infeasible. This conclusion is incorrect. Payment of fair share fees is a feasible mitigation measure which would allow the landfill to make needed modifications, and should have been examined in the DEIR.

In addition, the project analysis of landfill impacts is artificially limited to an analysis based on the existing condition. However, planning for landfill expansion is underway. Conceptual layouts for the facility expansion have been available since 2016, stakeholder outreach and planning have been ongoing since that time, and the Notice of Preparation for the expansion project is in development and expected to be released shortly (per the Western Placer Waste Management Authority February 14, 2019 Board of Directors agenda). The expansion is a reasonably foreseeable project, and conceptual layouts for the expansion have long been available, but the DEIR analysis does not examine the impacts of the project due to the expansion. Please revise the DEIR to include this cumulative analysis.

4.11 Noise

36. Page 4.11-34 Roseville Power Plant 2 – This section states that "The draft PRSP indicates a masonry wall would be located around the existing RPP2 site but does not provide specific performance criteria to ensure that adequate sound attenuation would be achieved." The DEIR should be modified to reflect the following:

- a. The specific plan developers shall be responsible for the construction of the wall, at their cost.
- b. The wall must meet City of Roseville Design and Construction Standards for sound barrier design, and should be submitted to the City for review, to ensure the City's facility is adequately protected from land use conflicts created by the Project.
- c. Mitigation Measure 4.11-4B should be revised to specify that either the wall, or a combination of a wall and setbacks, must result in the achievement of Placer County noise standards. Currently, the measure says only that a 5 dB reduction in sound is required, which is insufficient to offset this impact.

4.13 Public Services

37. Page 4.13-24, Impact 4.13-1. The City of Roseville Fire Department is currently providing a disproportionate level of service due to calls for service in Placer County in order to backfill

services in the Sunset Area. This project has the potential to substantially increase the need to provide mutual aid. This is not currently addressed in the DEIR. Although Mitigation Measure 4.13-1b states that two fire stations must be constructed in order to offset impacts of the project, the measure does not identify the locations, provide triggers for the timing of construction, or include any performance standards for determining the effectiveness of this mitigation measure, instead deferring that to a future decision-making process. The City has previously made this comment, and in response the DEIR has included a statement that fire stations are a permitted use on commercially zoned properties; this is not sufficient. Rather, the DEIR must disclose the size of the stations, where they will be located, the timing for construction, and how they will be funded, which are essential to the understanding of the impacts to the City of Roseville Fire services and whether they are being mitigated.

38. Page 4.13-27, Impact 4.13-2. The DEIR does not adequately address the law enforcement impacts and increased demands which would affect the Roseville Police Department. The plan area would directly adjoin the City of Roseville and would create the physical and visual impression that it receives law enforcement services from the City of Roseville. DEIR Page 4.13-1 specifically identifies that the City of Roseville expressed concern about impacts to City law enforcement services, but does not discuss City police services. The City has the following concerns:

- a. Communications Center impacts. Citizens seeking law enforcement services increasingly rely on cellular phones for their primary telephone services and do not have landline phones. Cellular 9-1-1 calls under the current technology are routed to the nearest “public safety answering point” (PSAP) via an imprecise system based on cellular phone tower location and antenna orientation. This project will result in daily increased calls for service to the Roseville Police Department, which is the PSAP for Roseville and handles all 9-1-1 calls, police dispatching, fire dispatching, and EMS dispatching for the City of Roseville. This increased demand would adversely affect the capabilities of the RPD because dispatcher workload would increase. Dispatchers would have to answer every additional call, triage the need for services, and then route to the proper agency, which is likely to result in reduced response times. The DEIR includes no discussion of this critical public safety impact.
- b. Traffic impacts. The California Highway Patrol Auburn Office provides coverage to hundreds of miles of state and county roadways and is lightly staffed. The Roseville Police Department is regularly tasked to respond and assist at major collision scenes near our city because of their staffing shortage. The proposed plan will greatly increase traffic volumes, on Fiddymont Road and Blue Oaks Boulevard, as indicated by the traffic impact study in the DEIR, which will result in increases in accident rates. This will result in increased demands upon the Roseville PD and Roseville FD to respond to collisions within the City. The DEIR states that because the project is not adding to the freeway system, no impacts to CHP services will occur, which is not accurate. Without additional CHP staffing the Roseville PD will receive increased requests for allied agency assistance from the CHP to this area.
- c. Page 4.13-27, on staffing for police services. Policy 4.H.1 of the County General Plan states: “within the County’s overall budgetary constraints, the County shall strive to maintain the following staffing ratios (expressed as the ratio of officers to population): a. 1:1,000 for unincorporated areas.” The DEIR does not adequately explain how the County will maintain this staffing ratio for the planned development, and whether additional stations or other physical facilities will be required. The DEIR indicates that 19 additional officers will be needed for the project. Nineteen officers will not meet the residential growth (24K population/roughly 8,000 units). An urban standard of one officer per thousand population would require a minimum of 24 Officers. There is also no analysis of the impacts due to a reasonably foreseeable student population of 30,000 at the proposed

university, even though some proportion of this population will live off-campus within the project area or surrounding cities such as Roseville. Additionally, there is no discussion regarding timing of officers, how police response will be handled during initial phases, or mutual aide.

- d. Response Times. The proposal would result in law enforcement staffing which is below the standards set forth in the County's General Plan. On page 4.13-4 of the DEIR, it is stated that the average call response rate is 15 minutes for Priority 1 calls. According to Policy 4.H.2 of the County General Plan: "The County Sheriff shall strive to maintain the following average response times for emergency calls for service: 6 minutes in urban areas." The DEIR does not include an analysis of how this development will affect response times.
39. Page 4.13-33, Impact 4.13-4. The project impacts to the City's Martha Riley Community Library (Riley Library) is a concern. The Riley Library is only 3.5 miles away from the project area. City of Roseville Parks, Recreation, and Libraries staff mapped the home addresses of all library cardholders who use the Riley Library (see Attachment 4), and found that a significant number of users are within close proximity to the County's Rocklin library and, nevertheless, still utilize Riley Library. This indicates that use of the Riley Library would increase even more due to the proximity of the project plan area to the Riley Library. This impact is acknowledged by the DEIR, but neither the SAP nor the PRSP include a public library to meet demands, and no fair-share fees to the City are included in mitigation. The DEIR instead speculates that it is possible the proposed university will provide a library which meets community-wide needs and is publicly accessible. The conclusion further states that unmet library demands within the project will be supported by a planned regional library within Placer Vineyards (DEIR page 4.13-34), even though the library is not currently planned for construction and would be a minimum of two miles farther away for residents than the City's Riley Library. With no commitment from the future university and no funding to build a new library within the project area, the City is concerned about the increased demand that will be placed upon the City's library, which could require expansion. This is an unmitigated and unfunded impact to the City library system which must be addressed in the DEIR.
40. Page 4.13-35, Impact 4.13-5. The City has a number of concerns related to the DEIR analysis of park impacts, as follows:
- a. The DEIR includes privately-owned park acreage in its determination that required parkland dedications are met. This is inappropriate, because this private parkland is not accessible to the public. At a minimum, the DEIR must demonstrate that the parkland dedication requirement will be met both for private and public subdivisions, to ensure that private parkland isn't being used to meet demand generated by populations who will not have access to these private recreational facilities. Counting private recreation facilities towards parkland requirements increases unmet park needs and increases the likelihood that residents of the project will increase use of and substantially degrade City facilities.
 - b. While the SAP area includes fewer residential units than the PRSP area, it will nonetheless generate a population that will have a demand for parkland. The DEIR does not include these units in its calculations of parkland, which further increases the unmet needs that City facilities will fill and impacts on City park and recreational facilities. See prior comment, above.
 - c. Thank you for looking at expanding one of the plan area's park sites. It certainly helps in addressing the recreation needs of the new community. According to the County standards, 4 hardball diamonds, 4 little league diamonds and 6.6 soccer fields are needed based on the projected population. Only 2.5 little league fields and 4.5 soccer fields are planned,

- however, leaving the unmet needs to be addressed by the City of Roseville. With no commitment from the future university to provide additional public park and recreation facilities, this impact on City park and recreation facilities due to increased use and facility wear and tear, leading to substantial deterioration of the facilities, will remain a significant unmitigated impact. See Comments 2 and 3, above.
- d. The DEIR discloses Roseville parks that are likely to be impacted by the project, but excludes key facilities from the list. The DEIR should be revised to discuss Stizzo Park, Harrigan Greens, Bos Park, Sierra Crossing Park and Astill Family Park. In addition, page 4.13.38 references Maidu Regional Park, but the closest regional park is Mahany Park, which is not listed or shown in the DEIR.
41. Page 4.13-44, Impact 4.13-13: Cumulative impacts due to additional demands on existing park and recreation facilities within the City of Roseville are potentially significant. The City has implemented in-lieu fees as a mechanism to address city-wide or regional parks within our boundaries. This does not include or address impacts or increased demands from beyond city limits, however, as described in the comments above. Therefore, this is an unmitigated and unfunded impact to the City's park system which must be addressed in the DEIR.

4.14 Transportation and Circulation

42. The City previously requested that the County address the extension of Foothills Boulevard. The DEIR continues to lack a description and analysis of the Foothills Boulevard Extension even though it is a necessary improvement for buildout of the project. This critical roadway needs to be identified as a project responsibility and evaluated at a project level to ensure that the improvements are feasible. The DEIR must include an analysis of the entire off-site portion of the proposed Foothills Blvd. Failure to include a project-level analysis at this time jeopardizes the ability of the County to obtain of funding and right-of-way dedications. Page 4.14-51, Foothills Blvd Extension: The DEIR specifies that 50% of the PRSP could be developed before this connection is needed, and that 75% of PRSP would need to be built before the necessary funding is available. The City takes strong exception to this assessment of need. The City's concerns with project scenario modeling assumptions, also stated elsewhere in this comment letter, indicate that the impacts to Fiddymont Road and Woodcreek Oaks Boulevard are substantially underestimated, and therefore the Foothills Boulevard extension may be essential to mitigating impacts to Roseville roadways. As a result, the DEIR analysis of the when this required facility will be necessary is significantly misstated as well. Additionally, the City takes issue with the fact that the DEIR does disclose the timing and funding of the roadway connection and bridge construction costs.
43. The analysis of the cumulative scenarios assume the completion of major roadways outside the boundaries of the project. The construction of these regional improvements will provide alternative routes of travel that will effectively minimize impacts to the City. Many of these projects rely on funding programs that have yet to collect the needed money to compete the projects. Therefore, to insulate the City from development impacts, without the assumed project in place, a Phasing plan should be developed that identifies threshold of absorption that could occur prior to the completion of corresponding improvements of certain roads that aid in minimizing impacts to existing streets.
44. The traffic modeling assumptions used in the scenarios analyzed in the DEIR include roadways connecting Fiddymont Road to Blue Oaks Boulevard, and Woodcreek Oaks Boulevard to Blue Oaks Boulevard through residential neighborhoods via Crocker Ranch Road and Parkside Way. While Crocker Ranch Road is a residential collector, this roadway has not been included in any previous traffic impact model analysis. Parkside way is a local residential roadway with residential frontages and is not appropriate to include in the model as a major linkage. A traffic impact analysis should

not rely on or include minor residential roadways such as these, because it creates alternate cut-through routes that are inappropriate, and artificially lowers modeled volumes on major arterials. Inclusion of these minor residential roadways in the model leads to an under-representation of the impacts on Fiddymment Road and Woodcreek Oaks Boulevard, as well as the impacts and timing expectations for the Foothills Boulevard extension as a required offsite improvement of the Project. The “Existing plus Project” model indicates 20,000 ADT on Parkside Way, a local residential roadway, and up to 24.9K ADT on Crocker Ranch, a two lane residential collector. These links should be removed from the model in order to accurately estimate the impacts to Fiddymment Rd Woodcreek Oaks Blvd and other roadways and intersections in the Study Area.

45. Pages 4.14-94 through -96. The Cumulative “No Project” traffic modeling and the various “Cumulative Plus...” scenarios include assumptions that are not reasonably foreseeable. The City does not agree with the following assumptions:

- a. Full buildout of SR65/I-80 interchange improvements. **Comment:** *While the SACOG MTP/SCS includes completion of this facility, funding sources are speculative and unsecured at this time. It is unlikely that full buildout of the interchange improvements will be funded and completed before significant traffic impacts develop as a result of the Project. Phase 1 and Phase 2 of the interchange project are reasonably foreseeable, based on funding sources. The model should be revised to reflect completion of Phase 1 and Phase 2 of the interchange only, in order to accurately calculate estimated impacts to other roadways and intersections in the study area.*
- b. Completion of Placer Parkway to Santucci Blvd/Watt Ave. **Comment:** *The City does not agree with the statement that construction of this segment is “predicated on development in the PRSP area.” Placer Parkway is an independent facility approved by the Placer County Transportation Planning Agency (PCTPA) in 2009 to meet regional transportation needs; it is not part of or solely dependent upon the SAP/PRSP project. The project and DEIR do not include a commitment by the County to build this facility with the project, nor does it include the necessary project-level environmental review required to build the facility. Completion of this segment of Placer Parkway is subject to funding provided through the SPRTA Tier II fee program which relies on development impact fees collected through full buildout of several other large development projects—projects which the transportation analysis does not include in the Project study area, such as buildout of Placer Vineyards and other areas subject to the SPRTA Tier II fee program identified in the Tier II Development Fee MOU dated December 9, 2008.*

Completion of Phase I of Placer Parkway can be reasonably assumed at this time due to the ongoing collaborative efforts between Placer County and the United Auburn Indian Community, in coordination with PCTPA, to advance funding for Placer Parkway Phase I. However, the Phase 2 segment cannot be assumed without including full buildout of the fee areas included in the SPRTA Tier II MOU. Therefore, completion of Placer Parkway Phase 2 is not reasonably foreseeable and should be removed from the model in order to accurately determine project impacts on the other roadways and intersections in the study area. If Placer Parkway Phase 2 is to be included as a reasonably foreseeable improvement, then the traffic analysis must be modified to assume full buildout of the SPRTA Tier II fee program areas as identified in the SPRTA Tier II MOU.

The result of these issues is a DEIR that misrepresents and understates cumulative transportation impacts. Having determined that Placer Parkway is dependent upon the project, the DEIR includes a Cumulative No Project scenario which excludes Placer Parkway and a Cumulative Plus Project scenario which includes the facility. Placer Parkway is a regional facility that causes significant changes to traffic distribution, which skews the

analysis and significantly underreports the impacts of the project on Roseville's traffic network.

- c. Riego Road is widened to four lanes from SR 99 to Placer County line. **Comment:** *These improvements are unfunded and are not currently identified in an established fee program. Further, these improvements are not included in the SACOG MTP/SCS. This segment improvement should be removed from the model in order to accurately determine project impacts on Riego/Baseline Road and other roadways and intersections in the study area.*
46. Blue Oaks Boulevard is extended west of Roseville city limits to Santucci Boulevard. **Comment:** *This segment is unfunded and not currently identified in an established fee program. This segment improvement should be removed from the model in order to accurately determine project impacts on Blue Oaks Blvd and other roadways and intersections in the study area.*
47. Page 4.14-39. The proposed LOS E within the project (Policy TM-1.2: Level of Service) is significantly lower than the adjacent County LOS C and City of Roseville LOS C. This will result in an inconsistency in the width and number of lanes on the two major roadways connecting PRSP to the Amoruso Ranch Specific Plan (ARSP). The ARSP model identified the need for 4-lane minor arterial roadways while the PRSP model indicates the need for 2-lane collectors. Increasing the PRSP roadways to 4 lanes would allow more south-westerly traffic volumes to utilize the 4-lane connections to 6-lane Westbrook Boulevard, which would alleviate project impacts to Fiddymont Road and Woodcreek Oaks Blvd.
48. Page 4.14-13, Table 4.14-8. Unsignalized intersection Operations – Existing Conditions. Junction/Park Regency will be signalized during summer 2019 by the City. Woodcreek Oaks/Crimson Ridge & Woodcreek Oaks/Painted Desert were signalized in 2018. Woodcreek Oaks/Northpark & Woodcreek Oaks/Parkside would need to be signalized at the time Woodcreek Oaks is “punched through” due to ongoing political and safety concerns. With all of these existing conditions changed, how does that change the model? The traffic analysis should be updated to reflect these factors, particularly with respect to the analysis of the proportion of intersections operating at LOS C or better. (These same comments apply to pages 4.14 69-71)
49. Page 4.14-27, Policy 3.A.7 – Dry Creek/West Placer Community Plan – *Arterial roadway Baseline – Sutter County Line to Walerga Rd/Fiddymont Rd: LOS E & Intersections Baseline Rd/Watt: LOS F and Baseline Rd./Fiddymont: LOS F.* Potential impacts to the above facilities, for the portions which are within the City of Roseville, should be analyzed in the DEIR based on City of Roseville level of service policy/standards.
50. Page 4.14-29. The DEIR includes the City of Roseville General Plan Policy establishing an LOS C threshold for all signalized intersections and roadway segments, but needs to be corrected as shown below in **bold, underlined** text.
- Maintain a level of service (LOS) “C” standard at a minimum of 70 percent of all signalized intersections and roadway segments in the City during the **a.m. and** p.m. peak hours. Exceptions to the LOS “C” standard may be considered for intersections where the City finds that the required improvements are unacceptable based on established criteria identified in the implementation measures. In addition, Pedestrian Districts may be exempted from the LOS standard.
51. Page 4.14-29. The City's LOS policy applies to both roadway segments and intersections. Instead of expressing roadway segment LOS policy in terms of volumes, the City relies on its intersection LOS criteria to determine roadway width needs; that is, the number of through lanes needed for an intersection to operate at an acceptable LOS C is equivalent to the number of lanes needed on the

roadway segment leading up to the intersection. Despite this adopted policy for roadway segments, no roadway segment impacts have been analyzed or identified in the DEIR for the City of Roseville.

52. Page 4.14-35. Proposed Road Access. Woodcreek Oaks Boulevard southerly into the City of Roseville –DEIR Impact 4.14-4 states that signal warrants will be met for this facility until the Foothills Boulevard extension is completed, at which point volumes would reduce to levels below signal warrants. Given that the DEIR specifies 75% of PRSP would need to be built before the necessary funding for Foothills Boulevard is available, mitigation should specify that a signal must be installed at Woodcreek Oaks/Parkside and Woodcreek Oaks/Northparkat the project's and/or County's expense. In addition to meeting signal warrants, this improvement will be vital because these intersections serve a park and school, and the signals will be needed to avoid safety impacts. Currently the City has been able to mitigate these safety impacts with an all-way STOP and pedestrian improvements, but these measures will no longer be effective due to the planned increase in traffic due to the project. The analysis should be updated to disclose this impact and identify effective mitigation.
53. Page 4.14-39. Proposed Sunset Area Plan Goals and Policy. Building off of policy TM-1.11: *Autonomous Vehicle Technology* there is no mention of any other Intelligent Transportation Technology/Systems (ITS) in this section or any other mention of it within the Transportation section. ITS technology needs to be incorporated into all areas of the transportation plan to take advantage of innovative technology that will help provide the safe and efficient movement of traffic within and between the jurisdictions.
54. Page 4.14-42, Policy TM-5.1 – Truck Routes – The County needs to work with adjoining/local agencies when updating its commercial (STAA) routes to ensure that adequate routes are provided to and from the local freeway system. A mitigation measure or policy language should be added to the DEIR and Specific Plan to reflect this.
55. Page 4.14-45, Exhibit 4.14-9. The change in ADT existing and existing plus Project Buildout shows only 40+ new trips generated on Fiddymment north of Pleasant Grove and Blue Oaks, which seems like an obvious underestimate of traffic on this four-lane roadway. Page 4.14-49 states that it would operate at LOS D, E, or F, which is extremely unclear.
56. Page 4.14-50. Phase 1 of Placer Parkway – This section states that several roadways and intersections in Roseville will experience degraded traffic operations, and that the County is currently in the final design stage for Phase 1 of Placer Parkway and is trying to secure funding for those improvements. The DEIR states that if funding is secured, construction is anticipated to be completed by 2022, which will help mitigate the traffic impacts. The DEIR further states that approximately 25% of the PRSP could be developed prior to the opening of Phase 1 of Placer Parkway, and that these impacts are considered significant and unavoidable. Given that funding is unsecured and construction documents have not been started, the estimate of a 2022 completion date for Placer Parkway Phase I is unrealistic. Since this facility is being relied upon to offset impacts, mitigation should be included which includes a development trigger for the facility. That is, mitigation must specify the amount of dwelling units representative of 25% buildout, and require that the facility be installed before any further residential building permits are issued.
57. Page 4.14-51. Significance after Mitigation – The DEIR explicitly states there is a timing gap between when significant impacts to Roseville facilities will occur and when funds for mitigation will become available. Specifically, it is stated that impacts will begin at approximately 50% of planned PRSP development, but funds for improvements wouldn't be available for any mitigation projects until 75% of the development in the PRSP area occurs. This is considered a significant and unavoidable impact when relying on the TIF program for mitigation, but the analysis does not

explore or describe whether there is other feasible mitigation which could reduce the impact at the time it occurs.

58. Page 4.14-54. SAP Area – PFE/Watt – will experience an increase in delay from 85 seconds to 492 seconds, which is more than 8 minutes. The DEIR states that the facility will meet signal warrants, but there is no discussion of whether the installation of a traffic signal in this location is within the Sacramento County CIP or planning documents.
59. Page 4.14-59, Impact 4.14-3: The City’s General Plan Circulation Element, page III-33, includes Level of Service Policy 1, which requires an LOS standard of “C” at a minimum of 70% of all signalized intersections and roadway segments. According to the DEIR, the project will cause PM peak hour operations in Roseville to drop from 84% to 68% of intersections operating at Level of Service C (LOS C). As a result, the proposed project will have a significant traffic impact because it will cause the City’s traffic network to be inconsistent with its own General Plan. Furthermore, the DEIR identifies more than 40 mitigation measures which are not within the City’s Capital Improvement Plan (CIP); therefore, there is no substantial evidence that the County has committed to ensuring that the proposed mitigation measures are fully enforceable. This is a significant concern to the City and is not adequately addressed within the DEIR. More specific concerns, which add to this comment, include:
 - a. The Traffic report identifies impacts on several facilities anticipated to operate at less than LOS C that otherwise would be classified as significant and unavoidable or mitigated to achieve a higher LOS, except that the SAP calls for changing the policy to LOS E (Policy TM-12). This is in contrast to the City/County MOU which expressly states that the County will achieve an LOS policy of C for all urban and suburban roadways excepting those that are within a ½ mile of state highways, where LOS D is acceptable.
 - b. There are multiple capacity improvements which the DEIR states are within the City’s CIP, and on that basis the analysis concludes the impacts are not significant. However, the analysis does not discuss how the project affects the timing of these improvements. The City’s CIP identifies when improvements are needed, and bases its funding on that timing. The proposed project will result in many of these improvements being needed much sooner—decades sooner—than had been anticipated, and yet this impact is not discussed.
 - c. 4.14-68 Signal Timing Improvements/Optimization is listed as a mitigation measure that is feasible and is part of the City of Roseville’s regular maintenance by City staff. The listed timing changes are not necessarily part of the City’s “routine maintenance,” however. The City must carefully consider any timing modifications, because adding green time to one movement will necessarily delay other movements, causing further impacts. Therefore, all of these proposed timing modifications must be evaluated to demonstrate that they would mitigate the identified impact without causing other impacts. This analysis should be provided within the DEIR.
 - d. A significant number of mitigation measures identified to improve impacts to City facilities are insufficiently analyzed or are infeasible. Examples include the following:
 - i. Mitigation Measure - Modify Signal Timing: The signal modification is proposed at multiple locations as a mitigation measure. Timing changes could adversely affect existing signal coordination along major corridors. Additionally, there will be costs associated with retiming individual signals and retiming the corridors. Additional evaluations should be completed to accurately determine the financial and LOS impacts to the City of Roseville. The following corridors require a more thorough investigation:

1. Blue Oaks Blvd Corridor
 2. Cirby Way Corridor
 3. Douglas Blvd Corridor
 4. Pleasant Grove Blvd Corridor
 5. Roseville Parkway Corridor
- ii. Mitigation Measure – Add Right Turn Overlap/Prohibit U-turn Movement: This mitigation measure is proposed at multiple intersections. In most cases, this would cause impacts that would restrict access to local businesses, and would therefore be infeasible to implement. Furthermore, the structural improvements which would be needed to implement these measures have not been identified, so the costs are unknown and are not contained in any existing fee program. These costs could be significant due to the large quantity of intersections affected. The following intersections are examples of infeasible mitigation:
1. Cirby Way/Riverside Ave Intersection
 2. N Sunrise Ave/Lead Hill Blvd Intersection – Business owner opposes restricting u-turns. U-turns were previously restricted and restrictions were removed due to impacts to business owners.
 3. Pleasant Grove Blvd/Fiddymont Road Intersection
 4. Pleasant Grove Blvd/Washington Blvd Intersection
- iii. Mitigation Measure – Intersection Widening: This mitigation measure includes construction of additional through and/or turn lanes which would require roadway widening at multiple intersections. Further analysis needs to be completed to evaluate potentially significant improvement costs that currently are not identified in any fee program. These costs include, but are not limited to, ROW acquisition/eminent domain, widening of receiving lanes, existing utility relocations, signal modifications, approval from Caltrans and other jurisdictions, and environmental impacts related to the improvements. Some improvements may not be feasible at all due to proximity to existing structures or City Council action. Some examples include:
1. Cirby Way/Riverside Ave Intersection – Roseville City Council has previously determined via Resolution that a third left turn lane at this location is feasible or desirable.
 2. Sunrise Blvd/Douglas Blvd Intersection – Infeasible due to proximity to existing structure.
 3. Roseville Parkway/Taylor Road Intersection – The mitigation is to widen west-bound approach to include a fourth through lane, but the facility is constricted by bridges on both sides and is infeasible.
- iv. Improvements proposed at the following locations are unclear based on existing geometry:

1. Douglas Blvd/I-80 Offramp
2. Pleasant Grove Blvd/SR-65 Northbound Ramp
3. Pleasant Grove Blvd/SR-65 Southbound Ramps
4. I-80 Westbound Offramp/Riverside Ave
5. SR-65 Northbound Ramps/Stanford Ranch Road

60. Page 4.14-63, Mitigation Measure 4.14-3 and 4.14-4 describe a fair-share fee program to offset the impacts to City of Roseville facilities. The measure states that the County “shall negotiate in good faith” with the City “with the intention of achieving, within a reasonable time period after approval [. . .] commitment for the provision of adequate fair share mitigation.” The project impacts to City facilities are extensive, and this mitigation measure is not well defined. The City has been requesting the County work cooperatively to craft mutually agreeable transportation mitigation measures since issuance of the NOP on November 3, 2016, so that these measures could be better defined for review by the public by the time of publication of the DEIR, but the County did not do so. The City is very concerned that the language presented in the DEIR about negotiating in “good faith” within a “reasonable time” does not commit the County to specific, feasible actions to offset impacts to City facilities and is, therefore, not enforceable mitigation.

In addition to lacking a firm commitment, the measure contains extraneous information which complicates the ability to achieve a good faith negotiation. The measure provides that the County may, at its own discretion, choose to include other jurisdictions and the formation of a JPA in the negotiations; this measure is to offset *project impacts to City of Roseville facilities*. All mention of negotiations with other jurisdictions and “regional improvements” should be eliminated, as they are unrelated to the impacts the measure is seeking to offset. The measure should also eliminate the explicit requirement that the negotiated agreement contain reciprocity, because again, this measure is to address *project impacts to City facilities*. The City agrees that it may be time to consider a broader discussion of a regional transportation fee agreement which includes reciprocity, but that should be a separate negotiation; it is unrelated to this CEQA mitigation measure.

Finally, the City is concerned that this measure states that fair-share fees are to be paid to Placer County, but does not include language which specifies that the funds are to be held in trust for the City of Roseville, or that the funds must be used to improve the specified facilities within the City.

61. The following Sunset Area Plan figures require amendment:

- a. Figure 1-2 Draft Land Use Diagram – update Foothills Blvd extension through Duluth
- b. Figure 2-1 Draft Circulation Diagram - update Foothills Blvd extension through Duluth. Is it a 6 lane with median?
- c. Figure 2-2 Bike and Pedestrian Mobility Plan - update Foothills Blvd extension through Duluth
- d. Figure 4.1.1 Circulation Diagram - update Foothills Blvd extension through Duluth
- e. Figure 4.1.2 Bike and Pedestrian Mobility Map - update Foothills Blvd extension through Duluth.

- f. Figure 4.7.1 Foothills Boulevard Location - update Foothills Blvd extension through Duluth – need to show cross section of Duluth

62. The following DEIR figures need to be amended:

- a. Exhibit 3-5 SAP Land Use Diagram – update to show Foothills Blvd extension through Duluth
- b. 3.6.1 Roadway Improvements Outside the PRSP Area – The extension of Foothills Boulevard through Duluth is shown in Exhibit 3-24 as a project related improvement, however the text in this section does not identify or describe the improvement.
- c. Exhibit 4.14-6 Placer Ranch Specific Plan Roadway Network- Foothills Boulevard extension is shown as a 4-lane roadway not the 6 lane as outlined and assumed in the DEIR
- d. Exhibit 4.14-7 Sunset Area Plan Network - Foothills Boulevard extension is shown as a 4-lane roadway not the 6 lane as outlined and assumed in the DEIR
- e. In addition, figures in the Traffic Impact Study are inconsistent throughout the document, showing portions of Foothills which will be four lanes in some cases and six lanes in others.

63. Page 4.14-91, Impact 4.14-13. As with other impacts to City services which have been raised throughout our comments, residents of the project area could be expected to rely on City of Roseville transit services. The DEIR provides no evaluation of transit trip distributions or of potential impacts to City of Roseville Transit. The DEIR should be revised to examine these potential impacts.

4.15 Utilities

- 64. The DEIR fails to analyze the impact on the landfill and the Materials Recovery Facility (MRF) due to the proportional increase in solid waste generated by the Project and by full build out of the SAP. The additional solid waste generated as a result of construction and operation of the project will reduce the life-span of the landfill. Expansion of the landfill will result in a financial burden to the rate payers, including Roseville residents. Mitigation should be required to ensure that the project pays its fair share for mitigation of the cumulative impacts to and expansion needs of the landfill. Furthermore, because the analysis did not examine full build-out of the SAP, the DEIR does not analyze the full extent of impacts to landfill capacity and solid waste disposal needs.
- 65. A wastewater metering facility location will be required for influent flows directed to the Pleasant Grove Wastewater Treatment plant, but the need for this facility has not been discussed in the DEIR, a location has not been disclosed, nor have the impacts been analyzed. The DEIR should be revised to include this information.
- 66. A recycled water metering facility location will be required, but this facility has not been discussed, nor has a location been disclosed in the DEIR and the impacts have not been analyzed. The City requests that this facility be located at the City/Placer Ranch boundary. The DEIR should be revised to include this information.
- 67. The Amoruso Ranch Specific Plan plans two 24-inch water stubs which terminate at the edge of the City, on the western boundary of Placer Ranch. DEIR Appendix F, Figure 4-1 shows proposed 12-inch water mains that extend from this location on the City's boundary into the project site,

ultimately connecting to proposed 42-inch and 24-inch water mains further within Placer Ranch. The purpose of the interties is to provide backup water for “reliability and emergency,” as described in the master water plan. If there is need to feed the 42-inch water main, a 12-inch line will be undersized. Instead of reducing the line size, please revise the project to continue 24-inch lines from the City/Project boundary to the interties.

68. Page 4.15-8. Add to recycled water section: “The recycled water system will require a re-evaluation of the recycled water availability at the time of connection. If improvements are needed, they should be paid for by the PRSP and SIA projects.”
69. Page 4.15-8, Add to recycled water section: “The City of Roseville will provide recycled water to customers on a first come first served basis. Placer County will be given an opportunity to reserve recycled water supply prior to PRSP/SAP development, as considered in the December 2009 South Placer Regional Wastewater Systems Evaluation Final Report.”
70. Page 4.15-8. The recycled water section of the DEIR must explicitly state whether recycled water demand for PRSP and SAP is within or exceeds the estimated peak day demand considered in the System Evaluation Study. Recycled water will be provided if adequate supply is available, but cannot be guaranteed above the amount contemplated in the study.
71. Page 4.15-9, Paragraph 1: The DEIR states that “Placer County and the City of Roseville work together to monitor growth, plan for treatment plant expansions, and ensure that adequate wastewater treatment capacity is available in the SPWA area.” This should be revised to reflect the fact that the SPWA partners (Placer County, Roseville and SPMUD), currently work together on the issues described in this sentence.
72. Page 4.15-12, 3rd Paragraph: This paragraph should disclose that the SPWA service boundary will be adjusted to include the entire PRSP and SAP. Please reference the study which shows that there is capacity for the additional flow in the sewer distribution system and at the PGWWTP.
73. Page 4.15-25, Wastewater section, Paragraph 1, sentence 1: The SPWA does fund regional wastewater facilities, but does not fund recycled water facilities.
74. Page 4.15-43, Impact 4.15-3. The net SAP PWWF is listed as 11.76 mgd, but is later listed as 8.49 mgd on page 4.15-45 (PRSP Area). This inconsistency should be corrected.
75. Page 4.15-46, Impact 4.15-3, the second paragraph talks about upsizing the 24-inch sewer line to a 27-inch sewer line. Neither the sanitary sewer master plan nor the hydroscience February 2018 technical memo talk about upsizing these lines. Is this still needed? If so, please add a mitigation measure requiring the development within the PRSP and SAP to construct and fund the upsizing of any sewer facilities.
76. Page 4.15-47, Impact 4.15-4. A calculation of current flows to the Pleasant Grove Wastewater Treatment Plant (PGWWTP) and the projected flow at buildout of the project are used to show there is capacity at the PGWWTP. Instead of using current flows, an evaluation of the South Placer Wastewater Authority (SPWA) build out flow conditions of the PGWWTP should be used to ensure that total flows at build out do not exceed ultimate capacity of the PGWWTP (24mgd), as this could require expanded capacity and associated environmental impacts that are not analyzed in the DEIR.
77. Page 4.15-47, Impact 4.15-4. The flow for the PRSP and SAP used in this section are 1.99 and 3.78 MGD respectively. These flows do not match the sanitary sewer master plan flows of 2.047 and 3.23 MGD respectively (DEIR Appendix H, page 19).

78. Page 4.15-48, Table 4.15-10 lists the SAP net ADWF as 3.782 MGD. This conflicts with the sanitary sewer master plan, Appendix H, which state 3.23 ADWF.
79. In Appendix G, please remove references to the North Zone Pump Station. The intent is to provide recycled water through the line in Woodcreek Oaks Boulevard.
80. In Appendix G, Section 4.3 Supply and Implementation: Please modify the first paragraph as follows: "...It should be noted that the recycled water supply for the project would be generated either at the Dry Creek or Pleasant Grove WWTPs, ~~though the majority of the recycled water sources are assumed to be from the Dry Creek WWTP.....~~"
81. In Appendix H, please remove references to the North Zone Pump Station. The City will determine the best way to provide recycled water to PRSP.
82. In Appendix H, page 19 states that the Placer Ranch development will generate a total ADWF of 2.045 MGD. This conflicts with the flow stated on page 3 of the SSMP (2.17 MGD ADWF). Please fix the inconsistency.

**COUNTY OF PLACER**
Community Development/Resource Agency

Michael J. Johnson, AICP
Agency Director

ADMINISTRATION**HAND-DELIVERED AND SENT VIA E-MAIL**

January 26, 2015

Kathy Pease
Principal Planner
City of Roseville Development Services Department
311 Vernon Street
Roseville, CA 95678

SUBJECT: Comments on the Notice of Preparation for a Draft Environmental Impact Report - Placer Ranch Specific Plan, Sphere of Influence and Annexation Project (City of Roseville File: PL-14-0453)


Dear Ms. Pease:

Thank you for providing Placer County the opportunity to provide these comments on the Notice of Preparation for the Placer Ranch project. County staff has reviewed the Placer Ranch Specific Plan Notice of Preparation, dated December 19, 2014, and provides the following comments for the City's consideration.

General Comments

1. It is important to note that the proposed Project is located entirely outside the City of Roseville's Sphere of Influence and entirely within the County's Sunset Industrial Area Plan. As set forth in Policy 1.A.10 of the Sunset Industrial Area Plan, the Plan specifically states that the County shall actively discourage the cities of Roseville, Rocklin and Lincoln from placing residential land uses adjacent to the boundaries of the Sunset Industrial Area and shall further encourage a one-mile separation between residential land uses and industrial uses within the Sunset Industrial plan area. The City has supported and concurred with this buffer for at least 20 years. In 1994, the City Council adopted Resolution No. 94-5, in which the Roseville City Council stated that it "strongly recommends that the Placer County Board of Supervisors provide no less than a one-mile zoning buffer around the landfill which will prevent inappropriate land uses, especially residential development from encroaching upon the Western Regional Sanitary Landfill."

In a subsequent letter from the City of Roseville to the County dated September 29, 2005, the City again concurred with the one-mile buffer policy by stating, "The purpose of this letter is to reaffirm the City of Roseville's strong support of the existing one-mile buffer policy which prohibits residential and other sensitive uses within the one-mile buffer of the existing Western Regional Sanitary Landfill and future landfill expansion property." The imposition of a one-mile buffer was upheld by the Third Appellate District and recognized this "restriction has a reasonable relation to the public welfare."¹

The Sunset Industrial Area is a critical area for the County and has been envisioned for decades as the economic engine for West Placer County. The Sunset Industrial Area Plan was most recently updated in 1997, with the plan area envisioned as a hub for high wage-earning jobs. Thus, the emphasis in the Sunset Industrial Area has been on uses that will produce high-wage earning jobs and not typical subdivision-type residential uses which are not even considered as an appropriate or acceptable land use within the existing Sunset Industrial Area Plan. As the City is aware, Placer County is currently preparing an update to the Sunset Industrial Area Plan; however, any decisions to change land use or policy directions by the Board of Supervisors is months away and subject to further analysis.

As a general comment, the County is concerned about the manner in which the proposed annexation is proceeding. At this time, based upon a mutual agreement reached in 2011, the area that is being considered for annexation is in the unincorporated area outside the Sphere of Influence of the City of Roseville. As has happened on a number of occasions, the City is considering an annexation and Sphere modification concurrently. The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 states that the purpose of a Sphere of Influence is as follows:

"In order to carry out its purposes and responsibilities for planning and shaping the logical and orderly development and coordination of local governmental agencies to advantageously provide for the present and future needs of the county and its communities, the commission shall develop and determine the sphere of influence of each local governmental agency within the county and enact policies designed to promote the logical and orderly development of areas within the sphere."

In the absence of the City relying upon a Sphere of Influence as State law deems appropriate, it is not possible for the County to know when and where the City may choose to annex a property. It is nearly impossible for the County to "advantageously provide for the present and future needs" of its constituents when there is no long-term understanding of the City's annexation and growth objectives. Given the County's long-standing interest in the Sunset Industrial Area as being essential to the County's ability to provide governmental services this uncertainty regarding where

¹ Although the case is unpublished, the *Placer Ranch Partners et al. v. County of Placer* (C032561) 2001 decision is an important "second opinion" as to the rational basis and need for the one-mile buffer.

annexations may occur is of particular concern. How can the County plan for services for a given region when adjacency to the City is the only criteria around which an annexation may proceed? For the Sunset Industrial Area, the fact that the Sphere of Influence was actually removed and yet an annexation is now proceeding highlights this concern.

For decades, the Sunset Industrial has been divided between the Spheres of Influence of Roseville, Rocklin and Lincoln. With the recent City/County agreement in 2011, the City's Sphere of Influence within the Sunset Industrial Area was pulled back and eliminated. For the first time, the Sunset Industrial Areas could be considered an unincorporated area that would receive services from the County. As a result of this agreement, in 2013 the County initiated the preparation of a Scope of Work and secured nearly \$1 million in funding for an update to the Sunset Industrial Area Plan. That update, now underway, has a number of significant challenges in terms of coordination with the City and the project proponents on land use, market demand, provision of services, public finance,

In the opinion of the County, the City should work with the County and the Local Agency Formation Commission on the identification of a Sphere of Influence for the City. That effort should be completed prior to the annexation of the Placer Ranch project or any other unincorporated lands adjacent to the City.

Existing Land Uses (NOP Section 4.0)

1. The Placer County zoning designations for the site include a Special Purpose (SP) designation because of the proximity to the West Placer Waste Management Authority's (WPWMA) facilities. The environmental document should acknowledge this designation when evaluating land use impacts.

The purpose of the Special Purpose zoning in this area is to communicate the importance of the long-term viability of the landfill property. As a member agency, the County is concerned whether the proposed land uses are compatible with the landfill facilities. The environmental should evaluate the land use compatibility and describe how the project will mitigate any impacts on WPWMA facilities.

2. The environmental document should analyze the potential impacts to new land uses, particularly residential uses, such as increased traffic, aesthetics, noise, ground water impacts, and litter as a result of being located in proximity to the landfill.
3. The environmental document should include a detailed analysis of the potential for odor impacts on the proposed residential/sensitive uses. The environmental document needs to identify all feasible mitigation measures and ensure that the project proponent will be obligated to pay and implement the same.

Land Use (NOP Section 6.0)

Proposed Project's Residential and Commercial Land Uses (NOP Sections 6.1 and 6.2)

1. The proposed Specific Plan covers significant agricultural land resources with current land designations of Agricultural 80 acre minimum. The proposed Specific Plan is also adjacent to areas designed as Agricultural 80 acre minimum and Public Facility/Agricultural 80 acre minimum. These agricultural lands are important to maintaining the balance and available supply of economically productive agricultural lands within unincorporated Placer County. Policy 1.A.9 of the Sunset Industrial Area Plan states that "The County shall seek to protect the industrial, commercial, professional and agricultural uses in the Sunset Industrial Area from encroachment by incompatible uses from the surrounding cities and from unincorporated area development." The environmental document should analyze the impacts resulting from the conversion of these lands to non-agricultural uses and must identify mitigation that would include in perpetuity conservation in another location within the City of Roseville's General Plan boundary or Placer County. Mitigation strategies should consider conversation of lands with equivalent agricultural land value, soil quality, and production value.
2. As build-out of the proposed Project is expected to occur over many years, the environmental document should analyze the land use conflicts that will occur between existing agricultural operations and new urban development as the project area builds out. Impacts to agricultural operations resulting from agricultural/urban interface should be analyzed for agricultural operations within the Specific Plan area and for agricultural operations bordering the plan area that are located in unincorporated Placer County. Mitigation measures, including buffering mechanisms project phasing and separation of incompatible land uses, should be proposed that would mitigate conflicts to a less than significant level in order to deter premature conversion of agricultural land uses to non-agricultural land uses.
3. The Sunset Industrial Area Plan contains several distinct planning areas. The western-most boundary of the Sunset Industrial Area Plan is designated as a potential Agricultural/Fairgrounds Relocation Area. Almost one-half of the proposed Specific Plan lies within this planning district. This Agricultural/Fairgrounds relocation area is considered one of the most prime sites for re-location of the Placer County Fairgrounds that are currently located in the City of Roseville. Future land uses and projects within the Agricultural/Fairgrounds Relocation Area could include outdoor amphitheaters, motocross/racing tracks and equestrian centers, and industrial-type agricultural uses. The potential exists for incompatible uses adjacent to each other. The environmental document being prepared for the Placer Ranch Specific Plan should consider the potential impacts that may be created with the implementation of the proposed Project, and identify appropriate mitigation measures to assure the long-term success of the proposed Agricultural/Fairgrounds area.

4. The Sunset Industrial Area Plan was originally approved by the Board of Supervisors to provide opportunities for the orderly development of new industries, as well as to allow existing industries to expand and prosper. With the introduction of residential uses into the Sunset Industrial Area as proposed with the Placer Ranch Specific Plan project, the environmental document should propose mitigation measures to reduce conflicts between these incompatible land uses, including but not limited to requiring a recordation of Buyer's Awareness Deed Disclosure Statements over the proposed project area notifying perspective land owners that the property they are purchasing is located adjacent to an Industrial Plan Area, and that current and future land uses within the Industrial area may result in nuisance from noise, odor, dust, vibration, potential release of hazardous materials, industrial traffic and industrial uses.
5. Residential uses are proposed in the Specific Plan that will encroach upon the existing Sunset Industrial Area where such residential uses are currently prohibited. Proposing sensitive uses such as residential units, elementary and middle schools, an age-restricted community and a university with a proposed student population of 30,000 students within this Industrial Plan Area is inconsistent with the City of Roseville's 1994 resolution which stated that the City of Roseville strongly recommends that the Placer County Board of Supervisors provide no less than a one-mile zoning buffer around the Landfill which will prevent inappropriate land uses, especially residential development, from encroaching upon the Western Regional Sanitary Landfill. Does the City plan to rescind Resolution No. 94-5 to allow the proposed Project to proceed and if so, what findings are anticipated to justify this action? Those findings should be articulated in the environmental document, as well as an analysis of all potential environmental impacts resulting from the rescission of this long-standing policy and the subsequent encroachment of residential uses within the one mile buffer area of the Landfill.
6. While it is unclear where the proposed university housing will be located, it would appear that the university housing will be located within the one-mile landfill buffer. The environmental document should analyze the potential for landfill odors, and noise from landfill operations that may adversely affect residential and commercial land uses with the proposed Specific Plan. The environmental document should also analyze how the encroachment of proposed uses on the landfill operations impacts landfill truck operations. In order to protect the long-term function and viability of the landfill, the environmental document should consider mitigation measures, such as recordation of Buyer's Awareness Deed Disclosure Statements, to inform prospective property owners of the proximity to the landfill as well as the future landfill expansion area.

The County is concerned about the long-term viability of the landfill if the one-mile non-residential buffer is reduced. Similarly, the County is concerned that the project deviates from the Placer County General Plan requirement that "new residential land uses shall be separated from the property lines of active and future landfill sites by a buffer of one mile." The environmental should acknowledge this County policy and analyze the potential impacts of deviating from this policy, including impacts to

existing and future landfill activities, ongoing operations, constraints that could be imposed on future expansion, and impacts to existing users of the facilities, including the County's franchise hauler and residents.

7. On the conceptual site plan, it appears that the lines depicting the buffer zone distances assume the landfill property will not develop the western expansion property southwest of the power lines. The environmental document needs to analyze the potential impacts of residential development within the one-mile buffer zone of *both* the existing landfill and the expansion area. In addition, the environmental document should consider the merits and liabilities associated with reducing the previously agreed-upon one-mile buffer, including the impacts to the long-term viability of the landfill (should the one-mile buffer be reduced).
8. The Notice of Preparation states that 15,000 parking spaces are provided for the university. In addition, on Page 14 of the NOP, it is noted that space is provided for approximately 3,900 vehicles to serve students, faculty and staff and visitors for the Sierra College transfer center. The environmental document should clarify if the parking spaces for the Sierra College transfer center are inclusive of the 15,000 parking spaces or in addition to the 15,000 parking spaces. The environmental document should also analyze opportunities for park-and-ride lots and alternative transportation such as transit. The environmental document should include the parking study that was presumably prepared to conclude that 15,000 parking spaces is sufficient for the university campus. The environmental document should also analyze impacts to neighboring areas and the industrial business due to parking overflow from the campus, and mitigation measures should be identified to reduce the impact.

Parks and Open Space (NOP Section 6.3)

Parks

1. The proposed Project will need to provide sufficient recreation and park facilities so as to ensure full mitigation of the recreational needs of the residents of Placer Ranch in its urban setting and to assure that park facilities in the unincorporated Placer County are not impacted by growth associated with this Project. The recreational and park impact analysis should be extended to consider the use of public recreational amenities by staff and students of the planned university.
2. The Project proponents and the City of Roseville staff are encouraged to work collaboratively with Placer County Parks and Grounds Division staff to coordinate connections to planned and existing trails within adjacent unincorporated Placer County. It is anticipated that the pending Sunset Industrial Area Plan update process will look at opportunities for future trail connections as well as other planning efforts whose timing coincides with the planning of Placer Ranch.

Open Space and Biological Resources

1. Over the past 14 years, Placer County has been working to develop the Placer County Conservation Plan (PCCP). In a letter from the City dated April 3, 2013, the City indicated that it preferred no regulatory coverage for the City within the existing City limits. However, the City indicated that it could elect to receive regulatory coverage under the PCCP for areas outside the existing City limits should the City choose to pursue annexation of those areas in the future. In correspondence from the City of Roseville dated September 24, 2014, it was indicated that "the City understands that Westpark has made a commitment to the County for Placer Ranch to participate in the PCCP ..." However, the Notice of Preparation for the Placer Ranch project states that the Specific Plan "proposed to append to the City's existing Open Space Preserve Overarching Management Plan...", and there is no mention of PCCP participation. The environmental document needs to resolve this inconsistency. The environmental document should analyze inclusion of the Project in the PCCP as feasible mitigation for biological resource impacts and present a consistency review with the 2014 administrative draft PCCP for that purpose. Mitigation should acknowledge that for coverage under the fully executed PCCP, the Specific Plan will have to be consistent with the terms of the final permit.

Public/Quasi-Public (NOP, Section 6.4)

1. Placer County, along with the cities of Roseville, Rocklin and Lincoln, is a member agency of the Western Placer Waste Management Authority (WPWMA). WPWMA provides recycling and waste disposal for residents of unincorporated Placer County and the other member agencies as well as the Cities of Auburn and Colfax, and the Town of Loomis. WPWMA facilities are located at Athens Avenue and Fiddymont Road and include a materials recovery facility, landfill, compost facility, recycling drop-off and buy-back center and a household hazardous waste collection facility.

The Notice of Preparation states that the Placer County General Plan and Sunset Industrial Area Plan identify the need to protect the Western Regional Sanitary Landfill (WRSL) and its expansion areas from potential conflict with off-site land uses. The environmental document should analyze the impacts that may result from the encroachment of residential uses on the landfill, and what mitigation measures are needed to reduce the identified impacts to less than significant levels.

2. As a member agency of the Waste Management Authority, the County is concerned that the project is not consistent with the Placer County General Plan and the Sunset Industrial Area Plan relative to goals and policies related to solid waste facilities. The environmental document should address these policies when evaluating the project impacts.
3. The Notice of Preparation states that a new solid waste recycling facility site is planned in the southeast portion of the project area. The environmental document should discuss in detail the proposed activities. At minimum, what materials would be accepted, how would such materials be accepted, from what sector (e.g., residential, commercial, industrial) would the materials be received. The environmental document should analyze the impacts on the surrounding community

based on the specific activities proposed. The environmental document should also clarify the proposed location of the facility; the conceptual site plan does not reflect a P/QP land use in the southeast portion of the Project.

4. The Placer County General Plan requires new development to be consistent with the Countywide Integrated Waste Management Plan which supports a secure and reliable waste stream to WPWMA, as its regional diversion programs are largely funded through solid waste tipping fees. As a member agency of WPWMA, the County is concerned about potential impacts on existing solid waste infrastructure and waste flows if the waste will not be taken to WPWMA for processing and/or disposal. The environmental document should analyze the impacts to the WPWMA waste stream as well as the economic impacts.

Right-of-Way (NOP, Section 6.5)

1. The developer will be required to obtain an Encroachment Permit or execution of an encroachment agreement for work proposed within Placer County's jurisdiction, including but not limited to construction of required frontage improvements along Sunset Boulevard West, the off-site Fiddymment Road realignment, off-site Sunset Boulevard, off-site Foothills North Boulevard, off-site Road D that crosses the former Formica property to Cincinnati Avenue, and where on-site improvements would have off-site impacts within Placer County's jurisdiction (such as drainage). These should be included in the required agency permits/approvals section of the DEIR, along with appropriate triggers for completion. In addition, the proposed Abandonments of existing County right-of-way, such as portions of Fiddymment Road, should be included in the list of permits/approvals.

Circulation (NOP, Section 7.0)

1. Contained in the Notice of Preparation, under the description of the Placer Ranch Specific Plan project, it states, "The off-site extension of Foothills Boulevard and Road D (from the east) and the off-site realignment of Fiddymment Road would be evaluated at a program level." The off-site improvements within the County's jurisdiction should be evaluated at a project level to ensure the improvements are feasible. This is particularly true for the realignment of Fiddymment Road where there are potential environmental concerns that could preclude the construction as proposed. There should be an analysis for the entire off-site portion of the proposed Fiddymment Road realignment, with exhibits depicting how and where it is proposed to tie back into existing Fiddymment Road. The analysis should include but not be limited to: Status of the existing Fiddymment Road alignment immediately north of the PRSP project. Will it be abandoned and decommissioned as part of this project? How will access to off-site parcels that front Fiddymment Road be affected and/or provided with the project? The timing of construction for the realignment of Fiddymment Road needs to be analyzed as well. Appropriate mitigation measures at a project-level should be included.

2. The County is concerned with the proposed realignment of Fiddymment Road. The environmental document should analyze the potential impacts to future landfill operations associated with this proposed realignment, and how the project will mitigate any impacts (e.g., reduced landfill expansion capacity), and analyze whether there will be temporary or ongoing impacts from the project regarding access to the landfill property on Fiddymment Road as a result of the proposed realignment or construction of the Project.
3. Because of the uncertainty regarding the realignment of Fiddymment Road, the County recommends that an alternative to the environmental document analyze maintaining Fiddymment Road in its current alignment
4. As stated in the Notice of Preparation, Sunset Boulevard will be the formal entrance and gateway to the university. Also, there is currently a narrow, two-lane bridge over the railroad crossing that should be analyzed in the environmental document to determine whether off-site improvements are warranted for this bridge.
5. Additionally, Sunset Boulevard West should be analyzed – in addition to the roadways list in the NOP – for off-site improvements along the project area boundary.
6. Any improvements identified in the environmental analysis for Sunset Boulevard outside of the project boundaries, as well as any improvements for Sunset Boulevard West, will be required to be constructed to per the Placer County Street Improvements Ordinance.
7. The DEIR should analyze whether or not Placer Parkway is needed in order for the Placer Ranch transportation system to operate. On Page 16 of the Notice of Preparation, there is a discussion of right-of-way as it relates to Placer Parkway and the acreage is defined, but it isn't clear if the right-of-way would be dedicated as was agreed to in the Memorandum of Agreement for the Tier II Fee Development Program, or if the Placer Ranch project requires both right-of-way dedication and construction of Placer Parkway or some scaled-back version of the Parkway within the planned alignment for project access and circulation.

The Placer Parkway right-of-way dedication is vitally important for the future construction of the Parkway to make sure the regional transportation system operates acceptably. In addition to the dedication, in the Circulation section on the same page, the Notice of Preparation identifies the Parkway being a four-lane roadway. The ultimate Parkway may require six lanes, and sufficient right-of-way should be dedicated to allow the expansion in the future if needed. The environmental analysis should be performed assuming six lanes for areas that the roadway may have an impact on development.

8. Development within the City of Roseville will have traffic impacts on the following intersections and roadways within Placer County and these impacts should be analyzed as part of the environmental document:

- Fiddymment Road from the Roseville limits to the City of Lincoln limits
- Sunset Boulevard West from Fiddymment Road to South Brewer Road
- Industrial Boulevard from the Roseville limits to the City of Lincoln limits
- South Loop Road and Placer Corporate Center Drive
- Sunset Boulevard from State Route 65 to Foothills Boulevard North
- Athens Avenue from Industrial Boulevard to Fiddymment Road

In addition to the above roadways, the environmental document should include a detailed analysis of all intersections contained within the limits of the Proposed Project. Necessary mitigation needs to be identified to ensure that the proposed Project's impacts are fully mitigated.

9. The need to improve, expand, and realign the off-site roadways should be analyzed in the environmental document, and triggers should be developed for when the improvements will be needed. This is particularly true for Fiddymment Road and Sunset Boulevard. All off-site improvements should be identified and commensurate with specific phasing identified, and supported by technical studies. There should be a detailed discussion of the off-site improvements, and a funding mechanism identified for the ultimate need. If these roadways will be used predominantly by City residents and residents of the Specific Plan area, then it may be appropriate for these improvements to be constructed by the Placer Ranch Specific Plan project, subject to fair-share costs.
10. The Mitigation section of the Transportation section should include a discussion of the use of off-site roadways by traffic which has an origin or destination within the City. A fair-share cost analysis should be undertaken based upon the degree of usage and cost of the facility.
11. The environmental document should include a discussion of transit, both internal and external to the PRSP area. The Western Placer County area is exploring the use of a Bus Rapid Transit system, and there should be an analysis performed for extending the service and preserving right-of-way in the Plan area.

Section 8.0 Public Utilities and Services

Potable Water

1. The Notice of Preparation states that the primary source of water supply will be explored with Placer County Water Agency, and that three groundwater wells are proposed for use during "drought" years. The Sunset Industrial Area Plan Policy 3.C.1 states that, "The County shall require proponents of new development to demonstrate the availability of long-term, reliable surface water supply for all urban uses." Such water sources would not include the use of wells. The environmental document should analyze provisions for reliable surface water to positively

demonstrate that sufficient surface water exists without reliance on wells, and the necessary distribution and collection systems exist or can be built to service the area.

2. With respect to the proposed use of groundwater, the EIR must analyze the potential impacts of the same in light of the Sustainable Groundwater Management Act of 2014 that came into effect on January 1, 2015, and applies to all groundwater basins in the State. (Water Code § 10720.3.) The proposed project is located within the North American Sub-Basin. On December 15, 2014, the Department of Water Resources published its official "initial prioritization" of the State's groundwater basins and has ranked the North American Sub-Basin as "high priority". Therefore, the environmental document needs to analyze the potential impacts to groundwater sustainability by the use of groundwater for this project, particularly in times of drought.
3. On January 23, 2015, the State Water Resources Control Board issued a "Notice of Surface Water Shortage and Potential for Curtailment of Water Right Diversions for 2015." The environmental document needs to address the proposed surface and groundwater uses in light of this notice.

Wastewater

1. Currently, the project's eastern parcels are within and are part of County Service Area (CSA) 28 Zone 2A3. Does the applicant proposed to de-annex these areas? Or does the applicant propose to annex the remainder of the parcels to CSA 28 Zone 2A3 and pay all associated CSA fees.
2. Reimbursement to the County for Sewer Creek Crossing - In 2008, the County paid Signature Properties \$917,814.91 for a portion of the installation of a sewer line under Pleasant Grove Creek that was constructed adjacent to the Old Fiddymment Road. The applicant is required to determine, and pay, its fair-share of the infrastructure on a pro-rata basis.
3. On Page 2 of the Notice of Preparation, there is a discussion of the need for two sewer lift station sites. As the general preference is to limit the number of lift stations and maximize gravity conveyance, the environmental analysis should analyze alternatives that minimize the use of lift stations.
4. On Page 21 of the Notice of Preparation under "Fiddymment Road Sanitary Sewer Line", the document indicates that Placer Ranch will tie into the 72-inch sanitary sewer line in Pleasant Grove Creek. The County believes it would be more appropriate to tie into the Pleasant Grove Creek sewer crossing on the north side of Pleasant Grove Creek. This issue should be analyzed in the environmental document.

Storm Drainage and Flood Control

1. The Placer Ranch Specific Plan area is located within the West Placer permit area subject to Placer County's Small Municipal Separate Storm Sewer System (MS4) Permit (State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000004, Order No. 2013-0001-DWQ), pursuant to the NPDES Phase II program. Project-related stormwater discharges are subject to all applicable requirements of said permit. The Project shall implement permanent and operational site design and source control measures as applicable. The Project must implement Low Impact Development (LID) standards designed to reduce runoff, infiltrate and treat stormwater, and provide hydromodification management.
2. Mitigation measures should be included in the environmental document to reduce the proposed Project's impacts to flooding to a less than significant level. Any off-site locations for stormwater improvements and/or retention should be analyzed at a project-specific level. The tributary draining to Pleasant Grove Creek on the southwest portion of the Specific Plan Area is within a mapped FEMA 100-year floodplain. Fill within the FEMA floodplain for the proposed development will require analysis and mitigation of downstream impacts, as well as completion of Conditional Letter of Map Revision (CLOMR) and Letter of Map Revision (LOMR) applications to FEMA by the developer.
3. Implementation of the Project has the potential to create the following impacts:
 - a.) Increases in both peak flow and volume runoff at downstream locations.
 - b.) Overloading of the actual or designed capacity of existing stormwater and flood-carrying facilities.
 - c.) The alteration of 100- and 200-year floodplain limits.

The environmental document will need to specifically quantify the incremental effects of each of the above impacts due to this proposed development, and the document will need to propose mitigation measures where appropriate. Additionally, the environmental document must specifically determine where stormwater detention mitigation is beneficial and where it is not recommended within the specific plan area.

Police and Fire Services

Emergency Services Issues

1. The County's Fire Station 77 is near the boundary of the proposed Specific Plan. Implementation of the proposed project will result in an increase in mutual aid calls for medical assistance and fire. The projected student population of 30,000 at build-out may create impacts on roadways for response times for the County to serve its constituents. County residents should not be expected to receive a lesser service level nor bear the costs of potential impacts to increased service calls. The

environmental document should analyze impacts to emergency services and include mitigation measures to address the identified impacts.

2. As the implementation of the proposed Project will result in the development of new commercial and industrial businesses, there will be an increased demand for fire prevention inspections services. The environmental document should analyze impacts to calls for service response times that may result from increased demands and traffic along County roadways, and the document should identify mitigation strategies along with identifying the responsibility for payment of these mitigation strategies.
3. The proposed Specific Plan area is located entirely within the annexation area for CFD No. 2012-1 that was adopted by the Board of Supervisors to address fire protection and emergency services within the Sunset Industrial Area. Mitigation measures should be proposed so that the remaining Sunset Industrial Area is not unfairly burdened if the proposed Specific Plan is developed in the City of Roseville. The United Auburn Indian Community has also expressed concern on this issue, and these concerns must be addressed in the environmental document.

Police Services Issues

1. Because of the proposed university component of the project, there is a high potential for impacts to County roadways resulting from the projected students, faculty, vendors, service providers, and visitors. The main entry into Sacramento State University campus is proposed from Sunset Boulevard, which lies within the County's jurisdiction. There will be increases in traffic, collisions and other incidents, and increases in calls for service and complaints from surrounding businesses. In addition, there is concern that there is a high potential for increased calls for mutual aid service due to the significant university population and adjacency of the "town center", as well as resultant increases in calls for adjacent properties within the County for service to the businesses due to vandalism, burglary and other nuisances.

It does not appear the proposed Specific Plan delineates a City police substation to handle increased amounts of calls for service. The County is concerned that this lack of police presence could result in an unfair burden for the taxpayers of Placer County to bear an increased burden for costs associated with the proposed development. The environmental document should propose mitigation strategies for these concerns and also analyze impacts on roadways and County response times to its constituency due to the main entry point for the university campus being on Sunset Boulevard and more importantly identify who will be obligated to pay for such mitigation of impacts on County Sheriff services.

Other Mandatory Analysis Sections in EIR

While not expressly identified in the Notice of Preparation, the environmental document must analyze hazards and noise. The following comments are provided for the scope of that analysis:

Hazards

1. The Placer County Environmental Health Department is the designated Local Enforcement Agency (LEA) for solid and hazardous materials management requirements, wastewater management compliance, and land use review for public health considerations for the proposed Placer Ranch project. As the LEA, it is the County's responsibility to ensure compliance with regulatory requirements that protect human health and the environment for facilities and public areas included in the proposed project.

The environmental document should include assess the potential for nuisance conditions and health and safety hazards associated with residing or operating a business or public area adjacent to an open or closed landfill. Conditions to be considered may include, but not be limited to: noise, odors, dust, wind-blown litter, lighting, landfill gas, and potential for groundwater contamination.

2. The environmental document should include an assessment of the potential for nuisance conditions and health and safety hazards associated with the current industrial businesses adjacent to the proposed project in regards to the potential storage, use, and accumulation of hazardous materials and/or wastes. The analysis should consider the industrial/commercial sites to the north and east of the proposed project, including two specific facilities: the Rio Bravo biomass facility and the Enterprise Products Operating LLC propane storage facility that are regulated under the California Accidental Release Prevention (Cal ARP) program. The analysis should consider, but not be limited to, noise, odors, dust, lighting, and the potential for hazardous materials and/or hazardous waste accidental releases. Other facilities that operate near the eastern edge of the project that utilize hazardous materials as part of their operation are recommended for review as well.
3. The California Code of Regulations (CCR) Title 27 § 21190(g) states that all on-site construction within 1,000 feet of the boundary of any disposal area shall be designed and constructed to mitigate gas migration into a structure. As this regulation specifies "on-site" construction, which means construction on the same parcel as the landfilled area, this would not be a requirement of the proposed project. However, if the project includes structures within 1,000 feet of the landfill, the environmental document should consider some or all of the conditions specified in 27 CCR § 21190(g) and propose some potential mitigation measures to address the identified impact. Mitigation measures that should be considered include, but are not limited to:

- a. Construction of a geomembrane or equivalent system with low permeability to landfill gas could be installed between the concrete floor slab of the building and subgrade.
- b. A permeable layer of open graded material of clean aggregate with a minimum thickness of 12 inches could be installed between the geomembrane and the subgrade or slab.
- c. A geotextile filter could be utilized to prevent the introduction of fines into the permeable layer.
- d. A perforated venting pipes could be installed within the permeable layer, and should be designed to operate without clogging.
- e. A venting pipe could be constructed with the ability to be connected to an induced draft exhaust system.
- f. An automatic methane gas sensors could be installed within the permeable gas layer as well as inside the building to trigger an audible alarm when methane gas concentrations are detected.
- g. Periodic methane gas monitoring could be conducted inside all buildings and underground utilities in accordance with Article 6, of Subchapter 4 of this chapter (section 20920 et seq.).

Noise

1. It is important to ensure that areas designated for industrial uses in the Sunset Industrial Area plan are protected from encroachment by noise-sensitive land uses. The County requires that new noise-sensitive land uses established next to existing industrial land uses or landfill activities, or adjacent to lands designated Industrial or Public Facility on the Land Use Diagram, shall be responsible for mitigating noise impacts from industrial activities. Noise sensitive land uses include: commercial uses, day care, professional uses, agricultural uses, and residential uses.

Whenever the allowable noise levels fall subject to interpretation relative to industrial activities, the County gives benefit to the industrial use. The environmental document should analyze noise sensitive land uses and propose mitigation strategies to protect the industrial uses from encroachment by these sensitive receptors.

2. The environmental analysis should include the preparation of an acoustical analysis to identify existing noise sources and identify how proposed residential uses in close proximity to existing industrial uses can be constructed to achieve County (or City) noise standards. The document should also identify mitigation measures that can be included to achieve noise standards and not impinge upon existing industrial uses and their right to continue operation. Further, the alternatives analysis needs to include an alternative that pushes residential uses further south in order to provide a buffer for purposes of noise attenuation to the residences and in particular outside

uses of those residences. The EIR should consider the imposition of a disclosure for all non-industrial uses of the nearby existing and potential future noise emissions.

Proposed Sphere of Influence Expansion and Annexation

As discussed previously in this letter, while not germane to an environmental analysis, the proposed Project does include a concurrent request to expand the City's sphere of influence and annexation into the City's boundaries. As the City has not yet commenced discussions with the County on the financial impacts of the same, the County provides the following comments.

Economic and Financial Issues

1. The County is concerned with the significant amount of non-residential square footage proposed for development within the proposed Specific Plan area and its associated potential to consume regional market capacity for such uses. Such a large volume of non-residential land use could leave the remaining Sunset Industrial Area at an unfair competitive position, with the potential result and creation of urban decay a result. The environmental document should include market studies that analyze and justify the demand for approximately 9 million square feet of non-residential uses. The environmental document should also identify the assumptions for phasing and build-out of such uses.
2. On September 19, 2011, the City Council approved the "Memorandum of Understanding Between Placer County and the City" ("MOU"). In the MOU, the City agreed to remove "any and all territory within the County's Sunset Industrial Area from the City's Sphere" in consideration for the County's agreement to allow Reason Farms to be annexed into the City's boundaries. Consistent with that MOU, the City's Sphere of Influence was pulled back by LAFCO action on October 12, 2011. (LAFCO Resolution No. 2011-3.) The City now proposes to expand its Sphere of Influence into the same area it agreed to rescind in 2011. As a result, the City must explain whether it intends to rescind the MOU and what findings will support the same. The environmental document must analyze the potential of significant land use conflicts and financial consequences of the proposed expansion and potential secondary environmental impacts that could result.
3. As the totality of the proposed Project is currently located within unincorporated Placer County, any proposed Sphere of Influence and/or annexation request should include an analysis of impacts to Countywide services.

The County appreciates the opportunity to provide these comments to the City for the Placer Ranch Specific Plan project. The County will continue to work cooperatively with the City to address issues associated with the project. Should new issues or concerns be identified that are not included in this letter, the County will work directly with the City to be sure any new issues are properly analyzed.

Should you have any questions regarding the information set forth in this letter, please do not hesitate to contact me directly at (530)-745-3000, or by e-mail at mjohnson@placer.ca.gov.

Sincerely,



MICHAEL J. JOHNSON, AICP
Agency Director
Placer County Community Development / Resource Agency

cc: David Boesch, County Executive Officer
Holly Heinzen, Chief Assistant County Executive Officer
Gerald Carden, County Counsel
Karin Schwab, Deputy County Counsel
Board of Supervisors
County Department Heads

Attachments

- City of Roseville Resolution No. 94-5
- Letter from the City of Roseville to Placer County, dated September 29, 2005

RESOLUTION NO. 94-5

RESOLUTION OF THE COUNCIL OF THE CITY OF ROSEVILLE
RECOMMENDING A MINIMUM OF A ONE MILE BUFFER AREA AROUND
THE WESTERN REGIONAL SANITARY LANDFILL TO PROTECT IT FROM
INAPPROPRIATE LAND USES

WHEREAS, the City of Roseville is a member of the Western Placer Waste Management Authority, a Joint Powers Authority which owns and operates the Western Regional Sanitary Landfill ("the Landfill"); and

WHEREAS, the Landfill, including its future expansion area, is the only available landfill in the western portion of Placer County and serves approximately ninety percent (90%) of Placer County's residents and businesses in the unincorporated areas and incorporated cities and towns; and

WHEREAS, the useful life of the Landfill and the future expansion area is over forty (40) years; and

WHEREAS, Placer County is currently updating the General Plan and as a part of that process may establish urban land uses around the Landfill; and

WHEREAS, the Western Placer Waste Management Authority has approved spending over \$21 million at the Landfill to construct a Materials Recovery Facility, pilot composting center, and household hazardous waste collection facility which is designed to operate for two (2) shifts and over sixteen (16) hours per day; and

WHEREAS, the Landfill will have increasing levels of work activity with the completion of these new waste management facilities which will increase noise, odors, dust, and other nuisances; and

WHEREAS, complaints about noise, odors, dust, and other nuisances have been received from residential neighbors living over two (2) miles from the Landfill; and

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WHEREAS, preventing inappropriate land use around the Landfill is of critical importance to protecting the future public health, safety, and welfare for the residents and businesses of Placer County depending upon the Landfill for proper waste management;

NOW, THEREFORE, BE IT RESOLVED by the Council of the City of Roseville that it strongly recommends that the Placer County Board of Supervisors provide no less than a one (1) mile zoning buffer around the Landfill which will prevent inappropriate land uses, especially residential development, from encroaching upon the Western Regional Sanitary Landfill.

City Manager

311 Vernon Street
Roseville, California 95678-2649

RECEIVED
OCT 05 2005
PLANNING DEPT.

September 29, 2005

Mr. Robert Weygandt, Chair
Placer County Board of Supervisors
175 Fulweiler Avenue
Auburn, CA 95603

RE: Placer Ranch/Western Regional Landfill Non-Residential Buffer

Dear Honorable Chair Weygandt:

The purpose of this letter is to reaffirm the City of Roseville's strong support of the existing one-mile landfill buffer policy which prohibits residential and other sensitive uses within the one-mile buffer of the existing Western Regional Sanitary Landfill and future landfill expansion boundary.

The City supports a university component in the Placer Ranch plan, however, we continue to be concerned that the project is not respecting the buffer policy that has been established and agreed to by both the County and the cities of Roseville, Lincoln and Rocklin. The City provided information to the County relative to the one-mile buffer issue in a letter from me to Jan Christopherson dated August 19, 2004. In that letter it was stated:

- *"Reaffirm Council support of the City/County Memorandum of Understanding (MOU) endorsing the one-mile buffer zone policy around the landfill for any sensitive land uses including residential and university uses that may conflict with landfill expansion and operations".*

The concern regarding the landfill buffer policy has been heightened in recent weeks by comments received by the City indicating that the County and Cities are amenable to considering a reduction in the buffer area. This categorically is not the case from the City of Roseville's perspective. The City of Roseville believes that sensitive uses, including universities, which will create a new sensitive constituency within the one-mile buffer area, are inappropriate. Every effort should be made to place sensitive uses outside the one-mile non-residential buffer area. The City has been on record in numerous letters to County staff on the project since 2003 that the one-mile buffer be maintained.

The Western Regional Sanitary Landfill (WRSL) is a very important regional facility that serves not only the City of Roseville, but our Joint-Power Authority partners as well. It is imperative that the long-term viability of landfill operations and expansion opportunities be maintained as regional growth proceeds and that impacts from local development on the landfill operations be adequately addressed. Truck traffic, noise, odor, and pests such as birds, rodents, and insects, make landfill uses inherently incompatible with sensitive urban uses. This is why they are consistently located away from urban activities that contain sensitive uses. Anything that compromises the existing landfill operations or the ability of the landfill to expand in the future is clearly not in the region's best interests. This is one of the reasons the existing Sunset Industrial Plan called for agriculture and a relocated fairgrounds site in the shadow of the landfill.

Regulatory oversight and the permitting process for landfills is a costly and lengthy process. Public opposition often makes the siting of landfills infeasible because of the issues associated with landfills indicated above. Therefore, every effort should be made to protect this regional resource. Further, with all of the growth occurring in the region, the landfill is an important resource that will be even more critical to serve future growth.

The one-mile non-residential buffer has been the subject of agreements between the City and County for quite some time. As noted in the 1997 City/County Memorandum of Understanding (MOU) *Section 6 "Both the City and the County hereby acknowledge their continued support and endorsement of the policy of maintaining a one mile buffer zone around landfill operations, as set forth in Policy No. 4.G.11 of the Placer County General Plan, adopted in August 1994."*

Section 4.G.11. of the County's General Plan states "When considering land use changes in the vicinity of a landfill operation, the County shall consider the landfill as the dominant land use in the area. In order to protect these facilities from incompatible encroachment, new residential land uses shall be separated from the property lines of active and future landfill sites (emphasis added) by a buffer of one mile. Such buffers do not apply to closed landfills or solid waste transfer stations. Other uses will be required to provide buffers as described in Table I-5. The intent of this policy is to prohibit the creation of new parcels for residential use within one mile of the landfill; not to prohibit construction of a residence on an existing legal building site within this area."

Roseville remains committed to maintaining the current one-mile non-residential buffer policy and trusts that Placer County Policy Makers are also committed to the long-term viability of this essential regional facility – for both the existing facility and expansion boundary.

Sincerely,


W. Craig Robinson
City Manager

C: City of Roseville City Council
Placer County Board of Supervisors
Tom Miller, Placer County
City of Lincoln
City of Rocklin
Jim Durfee, Director Western Placer Waste Management Authority
John Sprague, Community Development
Paul Richardson, Planning & Redevelopment
Kathy Pease, Planning & Redevelopment
Derrick Whitehead, Environmental Utilities
Jan Christopherson, Placer County
Ann Baker, Placer County Planning

Attachment: Letter from to Jan Christopherson dated August 19, 2004

City Manager
311 Vernon Street
Roseville, California 95678-2649

August 19, 2004

Jan Christofferson
County Executive Officer
175 Fulweiler Avenue
Auburn, CA 95603

Dear Jan,

At their meeting on August 18, 2004, the City Council provided direction on the proposed university sites and the Curry Creek Community Plan in western Placer County. This direction was intended to describe the City's interests, similar to the positions taken by the Cities of Rocklin and Lincoln, on proposed development adjacent to Roseville. The City Council was eager to be kept apprised of the projects and agreed that the planning process should include good communication and coordination between the City and the County. The Council provided the following direction:

- Strongly support establishment of four-year universities within South Placer County.
- Adopt a position of neutrality on the specific university proposals and the Curry Creek Community Plan until more analysis and information is available.
- Reaffirm Council support of the City/County Memorandum of Understanding (MOU) endorsing the 1-mile buffer zone policy around the landfill for any sensitive land uses including residential and university uses that may conflict with landfill expansion and operations.
- Direct City staff to work with the County and project developers to establish a process to address impacts to Roseville and direct staff to report back to the City Council on a regular basis.

The City strongly supports bringing the universities to South Placer and recognizes the benefits that come with universities in the region. We look forward to working with the County and developers to identify issues and address impacts from these projects.

Please feel free to contact me at (916) 774-5362 if you have any questions on the Council's action. We look forward to hearing from you about how the County would like to proceed.

Sincerely,



W. Craig Robinson
City Manager

cc: City Council

5.2 Management During Adjacent Project Construction

Past experience has shown that biological resources in Open Spaces are vulnerable to disturbance during construction (including new private development or modifications to improvements within existing Open Space undertaken by the City such as a sewer line connection). In general, the minimum area necessary for construction and access will be used. Construction limits will be set that do not allow fill within any preserved waters of the U.S. and habitat for Endangered Species unless permitted by the Agencies. To avoid impacts to the Open Space and the protected resources, the OSPOMP requires the following protective measures be taken during project construction.

5.2.1 *Improvement Plans*

The City will require that improvement plans for projects adjacent to Open Space show the boundaries and label the Open Space areas. This will allow those working adjacent to these protected areas to be aware of the presence of the Open Space.

5.2.2 *Pre-Construction Meetings*

Pre-construction meetings for construction occurring adjacent to (within 250 feet) or within Open Space will address the presence of the Open Space, the sensitive habitats present, minimization of disturbance to the Open Space, and the Plan requirements if preserved habitat within the Open Space is impacted. See Sections 8.3.2 and 8.3.3. City inspectors can also conduct a post-construction inspection to determine if post-construction remediation is needed.

5.2.3 *Biological Monitor*

A qualified biologist will be retained by the project proponent to monitor construction activities occurring within 250 feet of adjacent Open Space Preserve unless there is clearly not foreseeable impact to Open Space habitats. For example, if existing development or a roadway is within 250 feet of Open Space Preserve and all construction will occur within the roadway or on the non-Preserve side of the roadway or other development, a biological monitor would not be required.

When a biological monitor is required for construction activities, the monitoring biologist will be on-site on the first day of ground disturbing activities during the initiation of each construction phase (e.g., start of the installation of a new sewer line). Prior to ground disturbance, the monitor will lead a pre-construction meeting as discussed in Section 5.2.2. After that, the construction monitor will make regular daily visits to the site to observe construction activities (minimum twice a day). A journal should be kept of observations made during the construction monitoring. The construction monitor will immediately report to the Open Space Manager and appropriate project manager or inspector any activities that might result in un-permitted impacts to the Open Space areas. If work is stopped due to construction activities within, or affecting an Open Space Preserve, the Corps and Service will be notified within 72 hours.

For construction projects occurring within or adjacent to General Open Space areas, the need for a monitoring biologist will be based on the individual project's State and Federal permit requirements. Monitoring frequency and reporting requirements for construction projects

occurring within or adjacent to the General Open Space areas will be as prescribed within the project's plans and specifications.

5.2.4 Grading Within the Open Space

Grading for new development projects will likely include grading necessary to install roads, pads, bike trails, utility lines, and constructed wetlands, constructed swales/ditches, outfalls, etc. within and along Open Space boundaries. Projects that include these activities within Open Space will have obtained permits as needed from the Corps, Service, and City prior to initiation of construction activities. The only exception would be for outfalls and constructed swales/ditches which are discussed in Section 9.1.4 and activities that occur within the 50-foot transition zone where direct and indirect impacts will have already been identified and mitigated for in accordance with the development project's 404 permit (see Section 5.1). Grading will not disturb or modify existing waters of the U.S. unless the appropriate regulatory permits are obtained. Portions of the Open Space areas that are graded will be hydroseeded with native seed as described in Section 5.2.9 to re-establish vegetation.

5.2.5 Temporary Construction Fencing

Prior to construction adjacent to or within any Open Space Preserve area, high visibility temporary construction fencing will be installed (Figure 5-2. *Temporary Construction Fencing*).

Temporary construction fencing will be installed along all Open Space boundaries that border the new development. The fencing can be installed by project phase if the project is large (such as a specific plan) and there are Open Space Preserve areas that are not adjacent to the phase under construction.

The temporary construction fencing will be installed either along the Open Space Preserve boundary or at the inner edge of the 50-foot transition zone. It will be installed at the Open Space Preserve boundary if no work will occur within the 50-foot transition zone and it will be installed at the inner edge of the 50-foot transition zone if work will occur within the 50-foot transition zone (see Figure 5-2). Open Space boundaries that are contiguous with other Open Space areas need not be temporarily fenced.

Additional temporary construction fencing will be installed to protect sensitive resources and features based on the City's Grading Ordinance, Tree Preservation Ordinance, and State and Federal permit requirements when improvements such as bike trails, outfalls, etc., are installed. This will be a requirement for Open Space within new developments or for City projects within or adjacent to existing Open Space.

The temporary fencing will be maintained in good condition until permanent fencing is installed. The only exception would be if a project or phase within a project (such as specific plans) stops for greater than six months due to economic or other reasons. In this case, maintenance of the temporary fencing is not required as long as construction has stopped completely and there is fencing at the greater project or phase boundary that would exclude motor vehicles.

Upon completion of construction of each project or phase, this temporary fencing must be replaced by the project proponent with permanent fencing, except where the Open Space

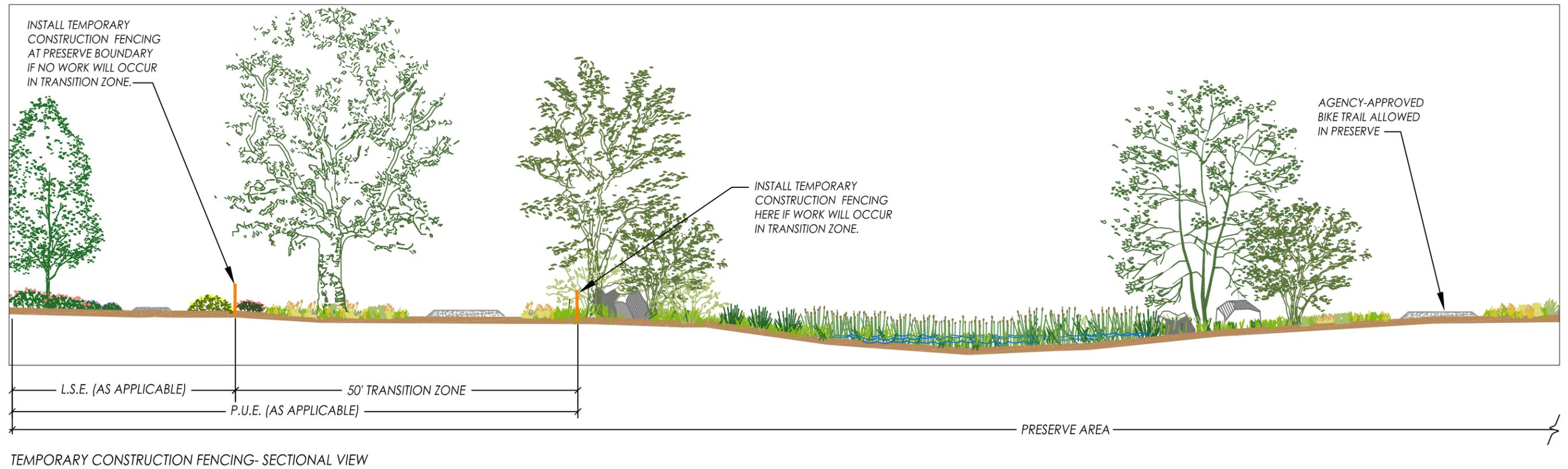
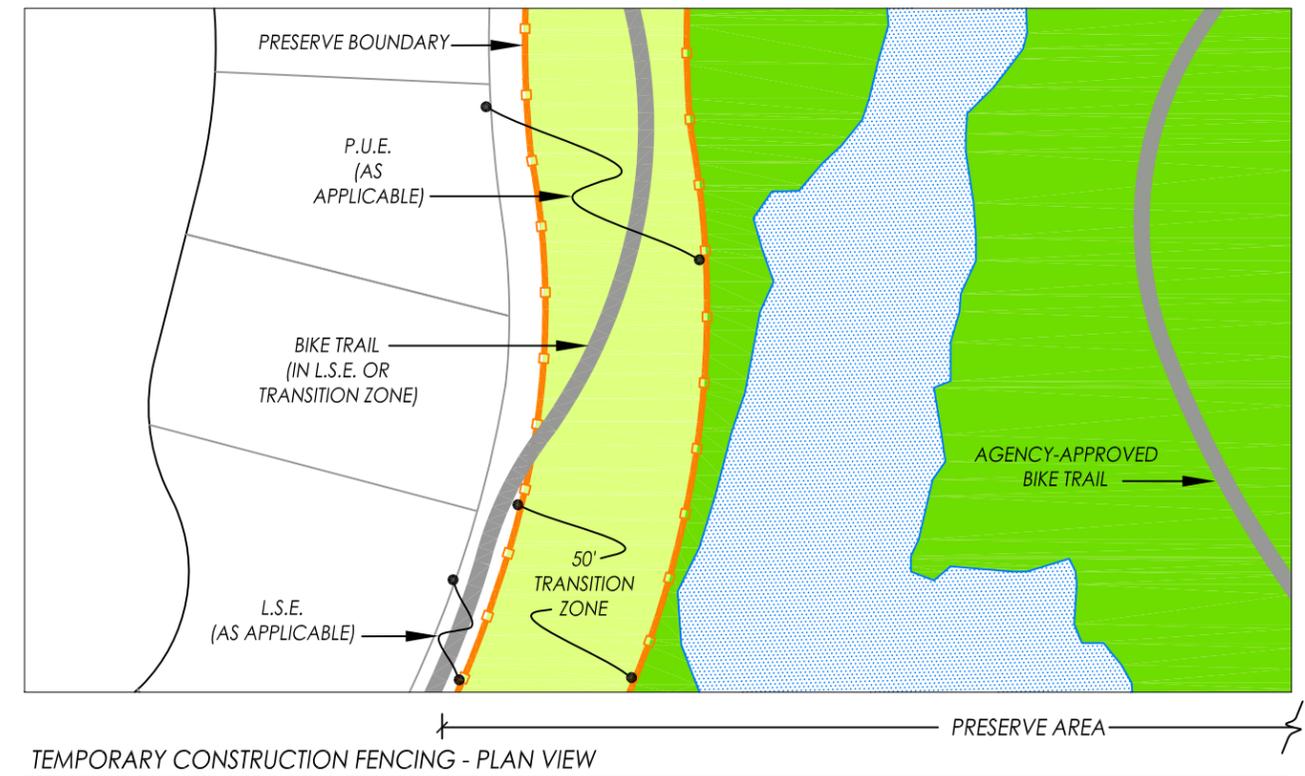


Figure 5-2. Temporary Construction Fencing

Preserve is contiguous with the Open Space of neighboring projects (Section 8.2.4) or is not required to prevent access to the Open Space.

5.2.6 Flagging Preserved Wetlands Adjacent to Construction Within the Open Space

If construction is occurring within Open Space, prior to installation of temporary construction fencing denoting the limits of construction, a professional wetland biologist will flag the preserved waters of the U.S. within 25 feet of the fencing. These brightly colored pin-flags will allow workers to be aware of the location of the protected habitat.

5.2.7 Stormwater Pollution Prevention

Stormwater BMPs prevent pollutant discharges into the Open Space and are required by the State Water Resources Control Board for any project over one acre in size. A Stormwater Pollution Prevention Plan (SWPPP) will be prepared and implemented to control sediment and erosion during construction. The SWPPP shall follow the City's adopted Design and Construction Standards and Stormwater Quality BMP Guidance Manual for Construction. The plan will include measures to minimize runoff from dust control and dewatering (e.g., creek crossings). Oil, soil amendments (e.g., lime) or other chemicals used in construction activities shall not be allowed to contaminate site runoff that discharges to the Open Space. For all construction related activities in and adjacent to the Open Space, perimeter BMPs shall be installed prior to ground disturbance regardless of the time of year. These measures will be maintained to ensure the construction site is prepared prior to the onset of any storm (i.e., straw wattle, silt fencing, etc.) as a minimum sediment control measure at all times (year round).

5.2.8 Temporary Stormwater Discharge

During construction, but prior to the completion of stormwater outfalls and associated swales, it may be necessary to discharge treated stormwater through the Open Space and into creeks and drainages. These discharge points will be located so that they do not result in flows being discharged into vernal pools and avoid inundating oak trees. This may require the installation of swales with appropriate erosion prevention measures to properly direct flows and ensure that erosion does not take place at any location along the swale or at the point of discharge.

5.2.9 Use of Native Grasses in Post Construction Revegetation

When construction work disturbs soil within the Open Space, all seed used to revegetate must be native to California, preferably ecotypes from western Placer or surrounding counties. Appendix 17 provides guidelines for seed mixes for different revegetation situations. Appendix 17 also provides information on local native grass seed companies.

5.2.10 Trash Removal and Post Construction Clean-Up

During construction, paper trash, food wrappers, and other trash often blows into Open Space from adjacent construction sites. The entity constructing adjacent to or within the Open Space will remove trash blown into the Open Space from the construction on a daily basis. After construction is complete and the temporary construction fencing has been replaced by

permanent fencing, temporary fencing and posts will be removed from the Open Space. Additionally, when disturbed areas adjacent to or within the Open Space (e.g., bike trail construction) have become revegetated and construction is complete, all temporary erosion control materials (e.g., straw bales, straw wattles and stakes, silt fencing) will be removed from the Open Space and discarded appropriately.

5.2.11 Construction Impacts/Post-Construction Remediation

Although steps are taken to avoid it, construction activities within the Open Space or accidental construction impacts (including discharges of sediment laden stormwater) may require post-construction restoration. Post-construction restoration means, for example, hydroseeding areas of the Open Space areas that were disturbed by equipment, restoring the original grade where the intent was not to alter it (e.g., smoothing out tire ruts or tracks), cleaning up construction debris, restoring accidentally impacted waters of the U.S. that were intended to be preserved, and generally reverting the area back to pre-construction conditions. A list of native grass species and other locally native plants that can be used in revegetation/restoration is included in this plan as Appendix 20 and included in the Parks Construction Standards.

Bonding and monitoring is required as outlined in Sections 8.3.2 and 8.3.3 if waters of the U.S. within City-owned Open Space are impacted. Impacts that occur within a project's specific Open Space Preserve prior to dedication to the City will be reported by the project proponent to the Agencies according to the OSPOMP. Restoration and monitoring will be conducted depending on the impact type, as outlined in Section 8.3 or as required by the Agencies.

5.3 Dedication Process for Open Space Preserves

The City takes management and maintenance responsibility for Open Space once adjacent development is complete and the project proponent has completed the transfer process/obligations outlined in this section. The Parks and Recreation Department Open Space Division procedures for dedicating an Open Space Preserve to the City is outlined below. Other departments in the City may have additional requirements as outlined in the project's improvement plans and/or Development Agreement:

Prior to dedication, the Open Space Manager or other designated City staff member will conduct a walk-through with the Open Space owner. The purpose of this walk-through will be to:

- Ensure that permanent fencing and signs have been installed.
- Ensure that cattle (grazing) fencing has been installed or the existing grazing fencing has been repaired or upgraded, if required.
- Ensure trash and debris has been removed from the Open Space Preserve.
- Ensure that any areas of erosion, sedimentation, or vandalism resulting from surrounding development have been corrected.
- Ensure that the project proponent conducted appropriate habitat maintenance activities prior to turn over to the City (e.g., invasive plant removal) such that the City is able to accept the Open Space Preserve in good condition.

38,214 borrowers
within a 10 mile radius

