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Letter
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Shirlee Herrington
Placer County Planning Services Division
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Email: cdraecs@placer.ca.gov

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.

4-1

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.

4-2

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.

4-2
cont.

- **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.

4-3

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.

4-4

- **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

4-5

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.

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cont.

- **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.

4-6

- **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.

4-7

- **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.

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- **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.

4-9

- **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.

4-10

- **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.

4-11

- **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.

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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.

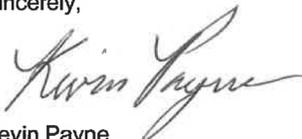
4-13

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 @pseville.ca.us](mailto:lhocker@roseville.ca.us).

Sincerely,



Kevin Payne
Assistant City Manager

City of Roseville DEIR Comments for SAP/PRSP – February 22, 2019
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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:

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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 it to allow streamlining later analysis of subsequent actions by providing a comprehensive and connected analysis. However, this analysis has done the opposite.

4-14

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.

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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

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- 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. 4-17 cont.
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). 4-18
 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. 4-19
 7. Page 2-80, Mitigation Measure 4.14-1a. The widening of Sunset Boulevard needs to occur before the first building occupancy. 4-20
 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. 4-21
 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. 4-22
 10. Page 2-91, Mitigation Measure 4.14-10. Fair share contributions to regional roadways should include Placer Parkway. 4-23
 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. 4-24
 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. 4-25

- 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. 4-26
- 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. 4-27
- 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. 4-28
- 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. 4-29
- 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. 4-30
- 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. 4-31
- 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. 4-32
- 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. 4-33
- 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. 4-34

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.

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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.

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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.

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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.

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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:

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- 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.

4-39
cont.

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.

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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.

4-41

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.

4-42

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.

4-43

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.

4-44

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.

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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.”

4-46

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.

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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.

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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 recommend 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.

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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.

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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

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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.

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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

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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.

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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.

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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,

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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.

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- 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.

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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 Fiddyment 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.

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- 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.

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- 44. The traffic modeling assumptions used in the scenarios analyzed in the DEIR include roadways connecting Fiddyment 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

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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.

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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.*

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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.

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- 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.

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- 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)

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- 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.

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- 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.

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- 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

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- 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. | 4-64
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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/Northpark at 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. | 4-65
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. | 4-66
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. | 4-67
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 Fiddymont 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. | 4-68
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. | 4-69
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 | 4-70

- explore or describe whether there is other feasible mitigation which could reduce the impact at the time it occurs. | 4-70
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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. | 4-71
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. | 4-72
 - 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:

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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

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 cont.

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.

4-73

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.

4-74

- 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.

4-74
cont.

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.

4-75

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.

4-76

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.

4-77

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.

4-78

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,

4-79

- 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.

} 4-79
 cont.
- 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.”

} 4-80
- 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.”

} 4-81
- 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.

} 4-82
- 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.

} 4-83
- 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.

} 4-84
- 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.

} 4-85
- 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.

} 4-86
- 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.

} 4-87
- 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.

} 4-88
- 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).

} 4-89

- 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. 4-90
- 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. 4-91
- 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....." 4-92
- 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. 4-93
- 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. 4-94

Letter 4 | City of Roseville
Kevin Payne, Assistant City Manager
February 22, 2019

4-1 The comment states that the Draft EIR analysis and mitigation measures are inadequate; however, the comment does not provide specific reasons specifying why the Draft EIR is inadequate. See responses below regarding the specific comments in this letter. Also, see Master Response 8: Recirculation.

Regarding the City’s request to review the fiscal analysis and development agreements, the County has coordinated with the City of Roseville regarding these items. This is not an environmental issue and no further response is required regarding this issue.

Regarding the oral comments provided by the City’s representative at the February 14, 2019, public hearing on the Draft EIR, see responses to comments PH-8 through PH-14.

4-2 The comment states that the Draft EIR conclusion regarding odor-related impacts is incorrect because the commenter asserts that payment of fair share fees is a feasible mitigation measure. See Master Response 4: Odors regarding the requirement of fair-share fees as mitigation for odor impacts and the feasibility of such mitigation.

The comment also notes that “the project analysis of landfill impacts is limited to an analysis based on the existing condition.” Indeed, as explained on Draft EIR page 4-3, “the baseline conditions for this Draft EIR are generally the conditions that existed in the SAP area in 2016,” consistent with State CEQA Guidelines Section 15125(a). The Draft EIR explains that “[t]his setting generally serves as the baseline against which environmental impacts are evaluated.” Therefore, the Draft EIR properly analyzes impacts associated with the landfill against existing conditions.

In Table 4.0-2, on page 4-10, the Draft EIR lists the Western Placer Waste Management Authority Waste Action Plan as a cumulative project. Acreage and nonresidential square feet or acres are listed as “TBD.” The discussion of cumulative impacts in an EIR must contain “[a] summary of the expected environmental effects” (State CEQA Guidelines Section 15130[b][4]). Section 15130(b) requires that the discussion “be guided by the standards of practicality and reasonableness.” As indicated by Table 4.0-2, insufficient information is known about the expansion plans to consider it

in the cumulative impact analysis. As noted in comment 10-3, submitted by Churchwell White LLP on behalf of WPWMA, the “expansion plans remain highly conceptual and are not yet complete.” Therefore, the cumulative analysis in the EIR appropriately does not consider expansion of the WRSL in the cumulative impact analysis.

- 4-3 The comment states that the proposed project results in a significant traffic impact in Roseville by decreasing the number of signalized intersections in the City that operate at LOS C or better from 84 percent to 68 percent, which is lower than the 70 percent standard identified in the City of Roseville General Plan. The comment further states that the Draft EIR identifies improvements in mitigation measures, which are not currently identified in the City’s Capital Improvement Plan (CIP). The comment also expresses concern regarding the fair-share fee program approach identified in Mitigation Measures 4.14-3 and 4.14-4 of the Draft EIR.

The improvements not currently identified in the City’s CIP are generally not necessary when the timing of the proposed project, reasonably foreseeable regional roadway improvements, and forecasted land development are considered. Since the traffic generated by the proposed project would occur over an extended period of time, the impacts causing the need for these improvements would not occur until after reasonably foreseeable regional roadway improvements and forecasted land development are completed. These completed projects will result in substantially different travel patterns, which are captured in the cumulative plus project traffic analysis.

As shown in Tables 4.14-39 and 4.14-40 on pages 4.14-123 and 4.14-125 of the Draft EIR, the cumulative plus project traffic analysis shows that more than 70 percent of signalized intersections would operate at LOS C or better when reasonably foreseeable regional roadway improvements are considered. Since the proposed project would occur over an extended period of time, the cumulative plus project traffic analysis is a more realistic representation of the project’s traffic effects, particularly when considering the reasonably foreseeable roadway and land use projects that will also be completed at that time.

Fair-share funding for improvements at City of Roseville locations would be incorporated into the development agreement between Placer County and the landowner in the PRSP area. Placer County would work with the City of Roseville to determine this fair-share fee.

- 4-4 The comment suggests that the Foothills Boulevard extension should be a required project improvement. The comment expresses concern that the impacts to Fiddymment Road and Woodcreek Oaks Boulevard are underestimated in the Draft EIR. The comment also expresses concern regarding the timing and funding of the Foothills Boulevard extension.

The Foothills Boulevard extension is not included as part of the project and is not required to provide access to the PRSP area. As described on page 4.14-35 of the Draft EIR, access to the project is provided by several roadways independent of the Foothills Boulevard extension. However, Impact 4.14-1, Impact 4.14-3, and Mitigation Measure 4.14-1b acknowledge that the Foothills Boulevard extension is a necessary improvement to mitigate significant impacts to traffic operations in Placer County and the City of Roseville. As described on page 4.14-51 of the Draft EIR, the existing access routes into the project would provide sufficient access until 50 percent of the development in the PRSP area is completed, at which point traffic operations would be degraded to a significant level and the Foothills Boulevard extension would be necessary to provide an additional access point.

Significant impacts to Fiddymment Road and Woodcreek Oaks Boulevard south of the PRSP area are appropriately analyzed in the traffic analysis, as described in Impact 4.14-3 and Impact 4.14-4. The Draft EIR notes that project impacts to the intersections along these roadways would be significant without the Foothills Boulevard extension.

The timing of when the Foothills Boulevard extension is necessary is based on forecasted traffic levels on Fiddymment Road, Woodcreek Oaks Boulevard, Blue Oaks Boulevard, and Sunset Boulevard

at an interim year (2025). These interim year forecasts consider anticipated growth in the West Roseville and Sierra Vista Specific Plans, as provided by City of Roseville planning staff.

- 4-5 The comment suggests that the project as proposed would result in increased demands on City of Roseville services and recommends revised mitigation measures to ensure that the project would meet anticipated service demands, in order to avoid impacts to City of Roseville services and facilities.

Potential impacts related to increased demand for fire protection and emergency response services were evaluated in Impact 4.13-1 of the Draft EIR. Impacts were found to be potentially significant, and Mitigation Measures 4.13-1a and 4.13-1b would be implemented to reduce this impact. (See minor revision to Mitigation Measure 4.13-1b described in response to comment 3-15.) Mitigation Measure 4.13-1a requires the project proponent to annex into an existing CSA Zone of Benefit or create a CFD to fund the revenue required for operations, training, maintenance, and personnel costs associated with maintaining the staffing ratios identified in Table 4.13-5 on page 4.13-24 of the Draft EIR. This is required prior to recordation of the Final Subdivision Maps or approval of Improvement Plans for each property, whichever occurs first. Mitigation Measure 4.13-1b requires a minimum of two new fire stations to serve the net SAP and PRSP areas, the environmental effects of which are evaluated as part of the project. Mitigation Measure 4.13-1b requires construction of the fire stations based on need and maintaining staffing ratios; as mentioned in response to comment 3-15, Placer County Fire anticipates that the second fire station would be needed around 25 percent buildout of PRSP. These mitigation measures include timing and performance standards and would reduce impacts to a less-than-significant level.

Potential impacts related to increased demand for law enforcement services were evaluated in Impact 4.13-2 of the Draft EIR. The analysis noted that a sheriff's substation is currently identified in the Placer Vineyards Specific Plan area, approximately 5 miles southwest of the project area. While funding mechanisms would ensure that there is sufficient funding, impacts would be potentially significant because the funding mechanisms were not yet in place. Mitigation Measure 4.13-2 would be implemented to reduce this impact to a less-than-significant level and requires the project proponent to annex into an existing CSA Zone of Benefit or create a CFD to fund the revenue required for operations, training, maintenance, and personnel costs. Similar to Mitigation Measure 4.13-1a, this is required prior to recordation of the Final Subdivision Maps or approval of Improvement Plans for each property, whichever occurs first. The mitigation measure includes timing and performance standards and would reduce impacts to a less-than-significant level.

- 4-6 The comment suggests that the evaluation of parkland provides credit for private facilities not open to the public, does not include the residential uses within the SAP, and does not comply with Placer County standards.

Page 4.13-7 of the Draft EIR notes that the project area includes existing privately owned and operated recreational facilities. Goals and policies of the Placer County General Plan encourage the development of private recreational facilities, but do not allow for parkland credit for private facilities.

As discussed in Impact 4.13-5, development in the net SAP area would generate an estimate 6,095 new residents and would require development of 60.5 acres each of active parkland and passive recreation area, open space with public access, or paseos. Additionally, 6.1 miles of trails would be required for the net SAP area. While the exact location and characteristics of these areas cannot be known at this time due to the programmatic nature of the SAP, there is sufficient land within the net SAP area to provide the required parkland acreage. While there are no proposed parkland areas in the net SAP area at this time, parkland dedication consistent with Placer County requirements would be developed concurrently with new residential development (see General Plan Policy 5.A.23). Thus, while parkland for the net SAP area has not yet be identified, there is sufficient land and it is

anticipated that parkland dedication and development would occur concurrently with residential development in the net SAP area.

Table 4.13-10 of the Draft EIR presents information regarding the type of recreation facility, the acreage or mileage required, the acreage or mileage provided, the credit received for each and whether the PRSP would meet the requirements. The information presented in the table shows that the PRSP would receive credit for 309.9 acres but that only 132.2 acres is required. Thus, the PRSP would meet County General Plan requirements for parks and open space dedication.

- 4-7 The comment states that the Draft EIR did not consider the project's effects on the lifespan of the landfill or build-out flows of the Pleasant Grove Wastewater Treatment Plant. The Draft EIR included an evaluation of project-related impacts to WRSL capacity. Impact 4.14-6 concludes the impact is less-than-significant because, after the recycling and diversion requirements for construction waste in the net SAP area and PRSP area are met, a total of 192,695 cubic yards of construction waste would remain, which would be 0.8 percent of the remaining capacity at WRSL. The Draft EIR also evaluated the project's cumulative contribution (including full buildout of the PRSP area and net SAP area) to WRSL capacity and, with implementation of SAP and General Plan policies, the project's contribution to impacts related to WRSL capacity exceedance is considered less than significant. (See Cumulative Impact 4.15-17.) No mitigation measures are required. Regarding wastewater flows, Impact 4.14-4 evaluates potential impacts to water treatment services associated with "wastewater flows generated "by buildout of the PRSP and net SAP areas." Furthermore, Cumulative Impact 4.15-15 evaluates the project's contribution to wastewater treatment capacity issues associated with implementation of cumulative projects (see Table 4.15-14 in the Draft EIR). Mitigation Measures 4.15-4a and 4.15-4b require annexation into SPWA's and Pleasant Grove Wastewater Treatment Plant's (PGWWTP's) service areas and confirmation of infrastructure capacity and reduce the project's cumulative contribution such that the project's cumulative impact is less than significant. All of the issues raised by the commenter are fully evaluated in the Draft EIR, and no revisions are required.
- 4-8 The comment suggests that Mitigation Measure 4.9-1b is insufficient because it does not require payment of fees to the City of Roseville, establish or discuss operational and maintenance funding, or reference the Pleasant Grove Retention Facility. This is because the City's Pleasant Grove Retention Facility is not the only retention option identified in the Draft EIR and because the Draft EIR is clear elsewhere regarding the funding for the Pleasant Grove Retention Facility (should that become the selected retention option). As stated in Section 2.3 of the Draft EIR, if the County or developer seeks to utilize Roseville's regional detention facility, the party would enter into a Funding Agreement with the City of Roseville to determine fair-share fiscal impacts associated with utilization of said facility. Costs to participate in the Pleasant Grove Retention Facility would be negotiated with the City of Roseville as the basin is owned by the City of Roseville. Preliminary analysis was included within the EIR. Subsequent analysis may be needed.

The Draft EIR further states (page 3-69): "To ensure that a mechanism is in place to fund construction of the project's proportionate share of retention at the City of Roseville's Pleasant Grove Retention Facility, a fee program (or equivalent mechanism) would be required, and fees would be collected by the County with each building permit. At such time that adequate funds have been collected, retention facilities would be constructed with sufficient capacity to meet the project's stormwater retention needs. If the City and County are unable to memorialize a joint-facilities agreement (or equivalent mechanism), construction of equivalent retention facilities, whether on-site or elsewhere off-site, would be required. Lastly, interim on-site retention facilities may be developed unless or until the Pleasant Grove Retention Facility is online, to fully accommodate the project's long-term stormwater volumetric requirements."

See Master Response 6: Drainage and Flooding and also Master Response 9: Mitigation and Development Fees.

- 4-9 The comment states that the Draft EIR does not examine the project in light of the planned landfill expansion, nor does it require right-of-way dedication for Placer Parkway. See response to comment 4-2 regarding consideration of the landfill expansion in the cumulative impact analysis. See response to comment 4-25 regarding Placer Parkway right-of-way dedication.
- 4-10 The comment raises general issues regarding the visual impact analysis in the Draft EIR. Comment 4-35 provides a more detailed version of this comment. See response to comment 4-35.
- 4-11 The comment expresses concern regarding the timing of mitigation measures in relationship to the timing of project phasing and construction. The comment does not identify specific issues with specific mitigation measures. The Draft EIR identifies timing for mitigation measures. Also, while not clearly expressed, the comment appears to be related to the PRSP. Per Section 17.58.200 of the County's Zoning Ordinance, the County is requiring approval of a Development Agreement for the PRSP. The PRSP Development Agreement sets forth regulations that the PRSP would be subject to including provisions related to the timing and triggers for mitigation. The SAP is an area plan and therefore, rather than identifying specific development, it guides the general types and intensities of development within the Sunset Area. Therefore, specific development phasing is not included in the SAP, and, in many cases, timing of improvements cannot be as specifically identified as it can in the Development Agreement for the PRSP. As mentioned, however, the Draft EIR includes timing mechanisms as appropriate for mitigation measures. See the Mitigation Monitoring and Reporting Plan included as Chapter 4 of this Final EIR which more clearly presents the timing mechanisms identified in each mitigation measure.
- 4-12 The comment states that mitigation measures related to the City of Roseville Power Plant 2 (RPP2) do not include specific performance criteria to ensure adequate sound attenuation would be achieved. However, Mitigation Measure 4.11-4b on page 4.11-36 of the Draft EIR specifically states that noise from the RPP2, at future planned receptors, shall not "exceed Placer County land use compatibility standards (e.g., 60 A-decibels [dBA] Day-Night Sound Level/ Community Noise Equivalent Level [L_{dn} /CNEL] for residential uses), daytime and nighttime noise limits for sensitive receptors (i.e., 45 dBA Equivalent Continuous Sound Level [L_{eq}]/65 dBA Maximum Sound Level [L_{max}] [night], 55 dBA L_{eq} /70 dBA L_{max} [day])." The mitigation measure further requires that a sound wall be constructed between the existing power plant and future planned receptors that achieves, at a minimum, a 5-dB reduction in sound. The combination of noise standards and design criteria for the sound wall are specific performance criteria that would ensure future planned receptors are not exposed to noise levels that exceed applicable standards. Minor revisions to Mitigation Measure 4.11-4b were made in response to comment 4-50 below. See Chapter 2, "Revisions to the Draft EIR," for the specific text changes. These are also described in response to comment 4-50.
- 4-13 The comment expresses concern about the Draft EIR cumulative impact analysis. See Master Response 7: Program- vs. Project-Level Analysis for a discussion regarding the level of detail for the SAP and the PRSP. Regarding the level of detail of the cumulative traffic analysis, the Draft EIR (page 4.14-2) explains that because buildout of the SAP is anticipated to occur over an extended time period (i.e., 80+ years) based on current market forecasts, the current travel models with their 20-year horizons are not equipped to accurately forecast detailed traffic conditions associated with an 80+ year buildout timeframe. Therefore, this scenario is evaluated at a lesser level of detail, consistent with Section 15130(b) of the State CEQA Guidelines, in recognition of the higher level of uncertainty associated with this level of development and a timeframe that would occur well beyond 20 years. This scenario is intended to describe the overall cumulative travel effects of the buildout of the SAP using trip generation and ADT forecasts to provide a cumulative impact analysis. No additional traffic analysis is required. It should be noted, however, that in response to comments regarding development capacity and to provide the requirement for future traffic analysis for projects that exceed the 20-year horizon forecast, SAP Policy TM-1.9 on page 4.14-40 of the Draft EIR is revised as follows (these revisions apply to the SAP and to the Draft EIR):

- ~~**Policy TM-1.9: Additional Traffic Impact Mitigation.** The County shall may require applicants further traffic analysis for land development projects to demonstrate consistency that are not consistent with the EIR land use assumptions of the EIR for this Plan. For projects that exceed these assumptions, the County will require additional traffic analysis and mitigation of impacts identified in the analysis. Future projects that exceed the level of development evaluated under the EIR's projected 20-year development scenario (see EIR Table 3-3), will be required to prepare individual, project-specific traffic analysis, and identify specific mitigation measures to mitigate impacts as necessary. Mitigation could include contribution to funding of transportation system improvement (e.g., traffic fees, VMT fees) and/or dedication of right-of-way for future improvements.~~

- 4-14 This is primarily a repeat of comment 4-13. See response to comment 4-13, above.
- 4-15 The comment summarizes CEQA requirements for legally adequate mitigation measures and states that the Draft EIR must address and analyze specific mitigation measures for impacts to the City of Roseville. More detailed comments about specific mitigation measures in the Draft EIR are provided later in this letter. See the responses, below, to the more detailed comments. Also, see Master Response 9: Mitigation and Development Fees.
- 4-16 The comment requests that the EIR's list of required permits and approvals should include an agreement with the City of Roseville delineating fair-share obligations for impact to roadways within Roseville. These issues are addressed in the Development Agreement for the PRSP. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. This comment is noted for consideration.
- 4-17 The comment states that a City/County funding agreement is required prior to commencement of development that requires Placer County to provide funding for all costs associated with developing a stormwater retention/detention storage solution. Section 2.3, "Required Permits and Approvals," of the Draft EIR notes that an "agreement with City of Roseville for outlining fair-share obligations for off-site retention at the Pleasant Grove Retention Facility" would be required if the County elects to utilize this facility for retention. The comment is acknowledged and, as consistent with the statement in Section 2.3 of the Draft EIR, if the County or developer seeks to utilize Roseville's regional detention facility, the party would enter into a Funding Agreement with the City of Roseville to determine fair-share fiscal impacts associated with utilization of said facility. Note that County staff revised Mitigation Measure 4.9-1b as shown in response to comment 1-4.
- 4-18 The comment is seeking clarification on the type of rubberized concrete required by Mitigation Measure 4.11-5a and suggests that a process or program should be required to ensure regular maintenance of the rubberized asphalt concrete (RAC). In addition, the comment suggests that RAC should not be used on truck routes as it is much less effective in this application.

To clarify what type of concrete is required, Mitigation Measure 4.11-5a on page 4.11-43 of the Draft EIR is revised as follows:

Mitigation Measure 4.11-5a: Reduce noise levels associated with new, expanded, or extended roads (Net SAP Area and PRSP Area)

Before finalizing roadway design for roadway expansion or new roadway construction, a design-level acoustical study shall be prepared to identify specific roadway design considerations, which shall be incorporated into final road design and approved by Placer County for roadways that result in a substantial increase in noise identified by Tables 4.11-12, 4.11-13, and 4.11-14. Roadway segments outside of Placer County are excluded (Fiddymont Road extension, Foothills Boulevard extension, and Woodcreek Oaks Boulevard extension). The following design features shall be considered:

- ▲ Roadway design shall provide sufficient setback between occupied structures that are defined as sensitive land uses by Placer County (or planned future sensitive land uses) and the roadway to minimize noise exposure to the extent feasible.
- ▲ In locations where setback is not feasible to reduce noise levels at existing or planned future sensitive receptors, roadway design shall incorporate quiet pavement types such as rubberized asphalt concrete (RAC) achieving at least a 4-dB decrease in traffic noise where feasible.
- ▲ Where existing sensitive receptors are located such that neither setback, nor quiet pavement, can reduce traffic noise from new or expanded roads associated with the project, the County shall coordinate with property owners of the existing residences regarding installation of sound walls along property lines to minimize traffic noise to meet exterior noise standards (city or County, as applicable) and, if necessary to meet the 45-dBA interior noise standards, upgrading windows that face the new or extended roadway.

Regarding regular maintenance of the RAC, as indicated in Mitigation Measure 4.11-5a, a design-level acoustical study would be prepared prior to the construction of new roadways. The acoustical study would consider and recommend feasible measures, which may include the use of RAC at that time, but this measure may not necessarily be implemented on every roadway where a noise impact has been identified. Similarly, if a noise impact were identified on a designated truck route then the acoustical study would ensure that appropriate noise-reducing measures are implemented. In addition, should RAC be implemented on certain roadways, like any other roadway within the county, regular maintenance and repairs would occur on an ongoing basis, as needed. The surrounding cities currently have funding programs in place to maintain city roads and transportation facilities and also would likely experience an increase in revenues related to increase in sales tax associated with visitor spending at shopping malls, restaurants and other establishments that generate revenue for the city. It should be further noted that according to CalRecycle, RAC can last up to 50 percent longer than traditional material, resulting in lower maintenance costs (CalRecycle 2018). No changes are necessary.

- 4-19 The comment erroneously refers to Mitigation Measure 4.13-8 on page 2-79 of the Draft EIR. As shown on page 2-79 and stated on page 4.13-42 of the Draft EIR, impacts related to consistency with applicable General Plan policies would be less than significant and no mitigation is required. Mitigation Measure 4.13-8 occurs on page 4.13-40 of the Draft EIR requires creation or annexation into a CFD for road maintenance. The surrounding cities currently have funding programs in place to maintain city roads and transportation facilities and also see an increase in revenues related to increase in sales tax associated with visitor spending at shopping malls, restaurants and other establishments that generate revenue for the city. Therefore, no additional mitigation is necessary.
- 4-20 The comment asserts that the widening of Sunset Boulevard identified in Mitigation Measure 4.14-1a needs to occur before the first building occupancy. As described on page 4.14-51 of the Draft EIR, approximately 25 percent of the development in the PRSP area could be developed before operations degrade to a significant level. This timing is based on forecasted traffic levels on Sunset Boulevard at an interim year (2025). These interim year forecasts consider anticipated growth in the West Roseville and Sierra Vista Specific Plans, as provided by City of Roseville planning staff.
- 4-21 See response to comment 4-4 regarding the extension of Foothills Boulevard.
- 4-22 The comment asserts that the impact fees identified in Mitigation Measure 4.14-3 should include the cost of timing new signals and retiming existing signals. Each agency controls and maintains traffic signals within their jurisdiction, which includes timing new signals and retiming existing traffic signals as part of their regular maintenance to respond to changes in traffic patterns.

- 4-23 The comment requests that fair share contributions in Mitigation Measure 4.14-10 include Placer Parkway. As described on page 4.14-50 of the Draft EIR, development within the PRSP and net SAP areas shall pay the applicable South Placer Regional Transportation Authority (SPRTA) fees. Development within the PRSP area will also be required to pay the Tier II Placer Parkway fee, which also provides funding for Placer Parkway. Development in the net SAP area is not subject to the Tier II Placer Parkway fee.
- 4-24 The comment requests that Draft EIR Exhibit 3-3 be updated to reflect the annexation of the Amoruso Ranch Specific Plan into the City of Roseville boundaries, which was approved by the Placer County LAFCO in December 2018. See revised Exhibit 3-3 in Chapter 2, “Revisions to the Draft EIR.” Throughout the Draft EIR, the Amoruso Ranch project is considered a City of Roseville project. Therefore, the minor official change in City of Roseville boundaries does not change any of the analysis or conclusions of the Draft EIR.
- 4-25 The comment indicates that objectives should integrate Placer Parkway. Chapter 3, “Project Description,” of the Draft EIR notes on page 3-21 that “because an EIR was certified for Placer Parkway and the project was approved, this EIR evaluates impacts of Placer Parkway in a cumulative context only and not as a project-specific element.” The proposed Placer Parkway project corridor was selected following the completion of a Final Tier I environmental review (FHWA-CA-FEIS-2009-46 and SCH No. 2003092069) to select and preserve a 500- to 1,000-foot-wide corridor. The preferred alternative would connect SR 99 at Sankey Road to SR 65 at Whitney Ranch Parkway (South Placer Regional Transportation Authority 2009).

The Final Tier I review was completed on December 3, 2009 when the South Placer Regional Transportation Authority (SPRTA) Board certified the Final Program EIR and adopted Findings, a Statement of Overriding Considerations, and a Mitigation Monitoring and Reporting Program for CEQA compliance (SPRTA Board Resolution #09-06). The SPRTA Board also selected the Placer Parkway Corridor – Alternative #5 with a No-Access Buffer (SPRTA Board Resolution #09-07). On May 7, 2010, FHWA completed the Record of Decision for NEPA, selecting Alternative #5 as the preferred alternative.

A Project Study Report–Project Report (PSR-PR) was completed and approved on September 29, 2010 (EA 03-2C5900) for the Whitney Ranch Parkway connection at SR 65. Whitney Ranch Parkway is the easterly extension of Placer Parkway beyond SR 65. This included a Type L-7 partial cloverleaf interchange for the southbound ramps and a Type L-2 spread diamond interchange for the northbound ramps with a three-lane overcrossing connecting the two sides. Northbound and southbound auxiliary lanes between Sunset Boulevard and Whitney Ranch Parkway were proposed along SR 65 to improve the operations. Each on-ramp would include provisions for ramp metering and an HOV preferential lane. A Supplemental PSR-PR, completed in October 2013, stages the interchange into two phases. The interim interchange includes the off-ramp and slip on-ramp to northbound SR 65, the loop on-ramp to southbound, and a three-lane overcrossing of SR 65. The auxiliary lanes, the southbound diagonal on-ramp and off-ramp, and widening of the overcrossing are deferred until the Placer Parkway Phase 1 Project was constructed.

A cooperative agreement between the City of Rocklin and the State of California was executed on October 24, 2013 to cover work on Plans, Specifications, and Estimate (PS&E), and right-of-way efforts for the Whitney Ranch Parkway Interchange. The interim phase of SR 65/Whitney Ranch Parkway (Placer Parkway) completed construction and was opened to traffic in 2016.

A Project Study Report – Project Development Support was completed and approved on June 1, 2012 (EA-2F920K) for the Placer Parkway Phase 1. The Placer County Board of Supervisors completed CEQA approvals by adopting the Initial Study/Mitigated Negative Declaration (IS/MND) for Placer Parkway Phase 1 on September 1, 2015. A Categorical Exclusion (CE) for NEPA approval was obtained on June 15, 2017. The Final Project Report was approved for Placer Parkway Phase 1 on August 23, 2017.

The Placer Parkway Phase 1 Project also includes the following elements:

- ▲ a four-lane grade-separated structure over Industrial Avenue and UPRR tracks,
- ▲ a new at-grade connection at Foothills Boulevard,
- ▲ a four-lane extension from SR 65 to Foothills Boulevard with a striped median, and
- ▲ widening of Whitney Ranch Parkway from SR 65 to University Avenue to six lanes.

The SR 65/Placer Parkway/Whitney Ranch Parkway interchange is an integral component of the ultimate Placer Parkway project. The project would include a standard L-9, partial cloverleaf interchange at SR 65. Improvements to the interchange include the following elements:

- ▲ widening the SR 65 overcrossing to six lanes,
- ▲ widening the southbound off-ramp,
- ▲ adding a southbound on-ramp,
- ▲ widening the northbound off-ramp,
- ▲ adding a northbound loop on-ramp, and
- ▲ adding auxiliary lanes between the interchange and the Twelve Bridge Drive interchange.

As noted on page 3-32 of the Draft EIR,

Future development that would occur with implementation of the PRSP would be consistent with the land use designations, which are described individually below and summarized in Table 3-4, and would comply with the Placer Ranch Development Standards, a companion document to the PRSP. The development standards provide the specific zoning regulations for land development projects and contain details regarding permitted uses, yard setbacks, site coverage, building height, and other similar restrictions. In addition, the Placer Ranch Design Guidelines provide specific design expectations for development projects within the PRSP area.

Placer Parkway right-of-way is identified on the PRSP Land Use Plan (Figure 4-1 in the PRSP Specific Plan documents) and Exhibit 3-11 in the Draft EIR. Parcel PR 200 is identified as Placer Parkway with approximately 158.51 acres identified (Table 4-1 PRSP Specific Plan) and Placer Parkway right-of-way estimates are noted in the Draft EIR Table 3-4. The PRSP Development Agreement defines the timing and triggers associated with dedication of right-of-way.

Section 4.6 of the SAP Corridor Design Standards and Guidelines also provides additional corridor guidelines for Placer Parkway.

- 4-26 The comment notes that Table 3-3 in the Draft EIR does not list any housing units for residential development that could be built within the commercial and industrial zones. The comment requests that because the project includes allowances for up to 30 units per acre in these zones, the table should be amended to show the amount of residential development assumed, most notably the residential assumptions used in the traffic study for these zones. The traffic scenario “Projected 20-Year Development” for the “SAP Area, Excluding PRSP,” is based on the EPS market analysis as described on page 3-27 of the Traffic Impact Study (included as Appendix M of the Draft EIR). The market analysis found that the vast majority of residential development within the 20-year timeframe is anticipated to occur in other areas within the region that are specifically designated for residential uses, including approved specific plans in Roseville, Rocklin, and Lincoln. This is reflected in the cumulative traffic analysis, as described on page 4.14-94 of the Draft EIR. The market analysis did forecast that within the 20-year buildout, 320 residential dwelling units could be expected in the SAP area, excluding the PRSP area. This is illustrated in Table 3-3 of the Traffic Impact Study.
- 4-27 The comment suggests that Exhibit 3-7 in the Draft EIR project description should be modified to show widened sections of Foothills Boulevard and Industrial Avenue within the City of Roseville and that this widening should be figured into the project cost and/or accounted for in the mitigation fee.

Exhibit 3-7 illustrates the circulation diagram for the roadway network within the SAP. This diagram is not intended to show the entire mitigated roadway network in the region and therefore no revisions are necessary.

- 4-28 The comment requests additional information for bus rapid transit (BRT). Page 3-26 of the Draft EIR (identified by the commenter) provides a summary of the transit features included in the SAP policies. Page 3-49 of the Draft EIR includes more specific transit features identified in the PRSP. Exhibit 3-18 in the Draft EIR illustrates locations for bus pullouts and shelters, including a conceptual route for BRT in the project area. Also, the project is required to prepare a transit master plan in which the detailed elements of the transit system would be provided.
- 4-29 The comment states that the City of Roseville will need to determine which plant or plants would deliver recycled water to the project, as noted in the fourth paragraph on page 3-55 of the Draft EIR. (The text referenced in the comment occurs on page 3-53 of the Draft EIR.) The comment notes that the plant or plants will be chosen based on capacity and that it would be premature to determine which one would be selected. The comment raises the general topic of recycled water does not identify any specific issues with the analysis provided in the Draft EIR. The project's potential recycled water impacts are addressed in the Draft EIR in Section 4.15, "Utilities," and mitigation measures to reduce potentially significant impacts are identified therein.
- 4-30 The comment suggests that there is a discrepancy between the average dry weather flow (ADWF) identified on page 3-55 of the Draft EIR, in the master sewer plan, and in Section 4.15, "Utilities," of the Draft EIR. The Draft EIR (page 4.15-66) explains the reason for the two ADWF numbers: "the Systems Evaluation estimated flows from the PRSP area development to be 2.17 million gallons per day (mgd) ADWF (RMC Water and Environment 2009:3-5 and 3-6). Development in the PRSP area is anticipated to generate an estimated 1.99 mgd ADWF, which is lower than the wastewater flows anticipated by the Systems Evaluation." No revisions to the Draft EIR are needed.
- 4-31 The comment suggests various considerations for the fees for Pleasant Grove Retention Facility. See response to comment 4-17.
- 4-32 The comment suggests that the segment of Foothills Boulevard within the City should be included in the discussion contained on page 3-64 of the Draft EIR. In addition, the comment states that the Draft EIR references the Foothills Business Park Annexation EIR but that document contained a different alignment and number of lanes, so it cannot be entirely relied on. The list of supporting infrastructure included on page 3-64 of the Draft EIR is limited to those projects that are required as part of the PRSP project but that are located outside of the PRSP area and were assumed to be included as part of the project description. The extension of Foothills Boulevard is required as mitigation as discussed on page 3-79 of the Draft EIR as part of the "Off-site Roadway Widening and Extension Identified as Mitigation" section and not included in the project description and therefore is not appropriate to list in this section of the document.

The alignment of Foothills Boulevard is consistent with the alignment included in the Foothills Business Park Annexation EIR. In addition, the Foothills Business Park Annexation EIR (page 4.5-34) identifies the Foothills Boulevard extension as a four-lane facility. However, the right-of-way width approved as part of the Foothills Business Park Annexation project (100-foot right of way per City's standard plan for a major arterial [ST-9]) is appropriate to accommodate the six-lane facility required as mitigation in the Draft EIR for the SAP/PRSP. It is therefore expected that there is sufficient right-of-way in the area evaluated in the previous EIR to accommodate the future roadway.

- 4-33 The comment suggests that the reference on page 3-69 of the Draft EIR to the Pleasant Grove Retention Facility fee program should note that a mechanism is in place to fund all associated costs for property acquisition, environmental review, design, construction, operation, and maintenance. In response to this comment, the last paragraph on page 3-69 of the Draft EIR is revised as follows:

To ensure that a mechanism is in place to fund construction of the project's proportionate share of retention at the City of Roseville's Pleasant Grove Retention Facility, including costs associated with property acquisition, environmental review, design construction, operation, and maintenance, a fee program (or equivalent mechanism) would be required, and fees would be collected by the County with each building permit. At such time that adequate funds have been collected, retention facilities would be constructed with sufficient capacity to meet the project's stormwater retention needs. If the City and County are unable to memorialize a joint-facilities agreement (or equivalent mechanism), construction of equivalent retention facilities, whether on-site or elsewhere off-site, would be required. Lastly, interim on-site retention facilities may be developed unless or until the Pleasant Grove Retention Facility is online, to fully accommodate the project's long-term stormwater volumetric requirements.

- 4-34 The comment notes that Foothills Boulevard is listed as a four-lane arterial on page 3-79 of the Draft EIR and in other sections of the document it is identified as a six-lane facility and requests fees for off-site mitigation of Blue Oaks Boulevard and Roseville Parkway. The section of the Draft EIR referenced containing the four-lane arterial is for the PRSP, which requires Foothills Boulevard as a four-lane arterial. Foothills Boulevard is identified as a six-lane facility for the SAP, which is consistent with the Draft EIR's description and analysis.

Section 4.14, "Transportation and Circulation," of the Draft EIR did not identify significant impacts on Blue Oaks Boulevard or Roseville Parkway; therefore, no mitigation was identified for the project. No revision to the Draft EIR is required.

- 4-35 The commenter asserts the update to the SAP will substantially increase development potential over the existing SIA Plan. To clarify, the baseline conditions for the environmental analysis under CEQA are the current conditions at the project area, as described in Draft EIR Section 4.0.3, "Baseline"; the baseline for the environmental analysis is not the buildout or planned development under the SIA Plan.

The commenter suggests that the absence of photosimulations from Viewpoint 6 in Roseville makes it difficult to understand the scope of visual impacts. While the comment is acknowledged, it is also true that, because no specific project developments are proposed or would be approved with adoption of the SAP and PRSP, photosimulations that depict specific development would be premature and potentially misleading. Moreover, CEQA does not require visual simulations. Rather, the content, level of specificity, and degree of detail for the aesthetics analysis are dictated by several State CEQA Guidelines sections. For example, Section 15146 requires that the degree of specificity required in an EIR correspond to the degree of specificity involved in the underlying activity described in the EIR, and Section 15145 indicates that a lead agency need not evaluate an impact that would be too speculative. As explained in this response to comment, visual simulations are not necessary to evaluate impacts, and visual simulations would require speculation.

Views from the city of Roseville would be of the PRSP area because the city is adjacent to the southern border of the PRSP area. As described in Draft EIR Section 4.0.1, "Program- and Project-Level Environmental Review," the PRSP is evaluated in the EIR at a project level. An evaluation of the visual change at Viewpoint 6 is provided on Draft EIR page 4.1-23, which states:

This area would have low-density single family homes around a central park space. It is unlikely that an area slated for development of residential uses could be designed to maintain rural character of the PRSP area consistent with *Placer County General Plan Policy 1.0.4....* Visual character would change from dominantly agricultural/grazing land to residential. Unity would increase to moderately high because the view would contain all residential development that would be consistent with proposed Placer Ranch Development Standards and Design Guidelines, though design of new homes may not be consistent with the design of the existing development partially visible from Viewpoint 6. Similarly, because of the homogeneity of development, there would be minimal intrusions that are not consistent with the visual characteristics of residential development. Therefore, intactness

would be moderately high. Although visual quality would increase, impacts would be potentially significant because of the substantial change in visual character where the PRSP proposes development in areas where there is some existing development but agricultural/grazing land is visually dominant.

Therefore, consistent with the State CEQA Guidelines direction on level of detail and speculation, the Draft EIR describes that the area seen from Viewpoint 6 would contain single-family homes that are designed consistent with the proposed Placer Ranch Development Standards and Design Guidelines. More detail about the appearance of homes and the development would be required to create an accurate visual simulation of the view from Viewpoint 6.

Providing additional descriptions of the appearance of homes, such as design, layout, or color, would be speculative. Such specifics would be chosen by the developer at the time of obtaining subsequent development entitlements, which are not currently being sought. By extension, creating a visual simulation that is accurate would require speculation. Therefore, the EIR does not contain photosimulations, and the analysis is adequate under CEQA. Furthermore, the commenter does not explain why the written analysis without photosimulations makes it difficult to understand the scope of the impacts; therefore, no additional response to this part of the comment can be provided.

The commenter also states that a view's quality and the impact on the view's quality depend on viewing location and viewer group observing the view. To clarify the approach used in the Draft EIR for assessing visual quality, visual quality is determined through an evaluation of vividness, intactness, and unity, as described on Draft EIR page 4.1-2. And, as described on Draft EIR page 4.1-14, the following factors are considered in evaluating visual impacts:

- ▲ existing visual qualities of the affected environment and specific changes to its visual character and qualities;
- ▲ the visual context of the affected environment;
- ▲ the extent to which the affected environment contains place or features that provide unique visual experiences or that have been designated in plans and policies for protection or special consideration; and
- ▲ the sensitivity of viewers, access of viewers, their activities, and the extent to which these activities are related to the aesthetic qualities affected by the project-related changes.

The commenter claims the viewpoints included in the Draft EIR are not representative of viewpoints observed by the public in those locations, that the photos do not represent actual views, and that the photos ensure there are encroachments in the foreground to distort the actual view. As explained on Draft EIR page 4.1-5, the key viewpoints “represent typical views in the project area and provide an overall sense of the visual setting of the project area and a basis for describing the range of impacts that would occur with project implementation.” The Draft EIR further explains on page 4.1-5 that “[t]he viewpoints are not intended to identify important views or specific visual characteristics.”

Much of this response focuses on Viewpoint 6 because the commenter uses Viewpoint 6 as an example. The commenter is correct that some photos contain encroachments in the foreground; however, these encroachments are common and therefore appropriately and accurately included in the photographs from key viewpoints. Consistent with the Placer County General Plan goals and policies (e.g., Policy 1.0.3, Policy 1.K.3, and Policy 1.0.10), the analysis in the Draft EIR focuses on public views. Most of the portion of Roseville area adjacent to the PRSP area contains private residential development. Other than Viewpoint 6, public views of the PRSP area from Roseville are located at dead ends that are unlikely to be visited by substantial numbers of viewers. Public viewpoints from Roseville of the PRSP area include a portion of a pedestrian pathway from Brick Mason Circle that dead-ends at the PRSP area, a dead end of Grove Hill Way, Fiddymont Road (Viewpoint 6, which continues through the PRSP area), and a dead end of Woodcreek Oaks Boulevard. Therefore, the view from Viewpoint 6 is the most representative viewpoint of the PRSP

area from Roseville because it is the public point from which most viewers in Roseville would see the PRSP area. The description of Viewpoint 6 on Draft EIR page 4.1-12 notes encroaching elements such as a power line and road in the view of the PRSP area. Therefore, the encroaching elements are a representative component of public views from Roseville of the PRSP area. Therefore, no additional viewpoints need to be identified in response to this part of the comment.

As to the commenter's claim that the photo from Viewpoint 6 has been distorted by the viewpoint's positioning further back from the end of the road or sidewalk, making it inaccurate for views from Roseville, Viewpoint 6 as it is currently located is indeed the most accurate to represent public views in Roseville on Fiddymont Road. Most viewers on Fiddymont Road within Roseville would indeed see suburban visual elements, such as light standards. Only when drivers or pedestrians are at the border of Roseville about to enter the PRSP area would these elements possibly not be within their view because suburban development occurs up to the city limits. A photo from Fiddymont Road without suburban elements would not be representative of the typical motorist or pedestrian view on Fiddymont Road in Roseville toward the PRSP area. Rather, a view with suburban visual elements is most representative of public views of the PRSP area from Fiddymont Road in Roseville. The commenter has not identified any specific viewpoints that should be considered in the Draft EIR; therefore, no additional response needs to be provided.

The commenter asserts that the conclusion that vividness, unity, and intactness are low has "very little explanation" and that the unity and intactness conclusions are based on an "assumption" that the foreground contains urban residential elements. On page 4.1-12, the Draft EIR explains:

Vividness is low because there are no distinct visual patterns or elements. The view has low unity because of the lack of integration of residences into the grazing area and the resulting abrupt transition. The intactness is low because modern residential developments are not a common visual intrusion associated with grazing areas.

Therefore, the conclusion about vividness, unity, and intactness at Viewpoint 6 are supported by explanation. Regarding the assertion that the conclusions are based on an "assumption" about residential elements in the foreground; to clarify, Viewpoint 6 indeed contains encroaching residential elements in the foreground. Relatedly, the commenter states the Draft EIR's conclusion regarding unity and intactness are based on incompatible urban residential elements in the foreground. However, the Draft EIR does not state that the residential developments are incompatible; rather, the Draft EIR states that the residences are not integrated and result in an abrupt transition with the grazing area and that modern residential developments are not a common visual intrusion associated with grazing areas. In addition to the fact that there are residential elements in the foreground, this viewpoint is the most representative of public views of the PRSP area from Fiddymont Road in Roseville, as explained previously. Therefore, no revisions have been made to the Draft EIR in response to this portion of the comment.

The commenter states that city residents who live and travel on the southern boundary of the project area have significant views of the Sierra Nevada. The Draft EIR recognizes visibility of the Sierra Nevada foothills and mountains on page 4.1-2: "[t]he Sierra Nevada foothills and mountains of the Sierra Nevada are visible east of the project area." The Draft EIR also explains why the Sierra Nevada is not a significant visual feature, contrary to the commenter's claim that it is: "[T]he Sierra Nevada is not a dominant feature because of distance and atmospheric haze." Additionally, despite the commenter's claim that future development would block views of the Sierra Nevada, such a conclusion is uncertain and speculative. As previously described, CEQA does not require speculation in evaluating impacts. Heights and locations of buildings that would be constructed within the project area cannot currently be known because there are no development proposals for consideration. Whether a taller building would block a public view is dependent on viewer location, building height, building size, and, in the case of views of the Sierra Nevada, atmospheric haze. Without this information, an analysis of whether development would block the Sierra Nevada would require

speculation. Therefore, no revisions to the Draft EIR have been made to change its conclusion about the significance of this aesthetic impact.

- 4-36 It is unclear whether the comment is stating that there are many odor complaints within 1 mile of the WRSL or that with a buffer of 1 mile there are in total many odor complaints. To clarify, Exhibit 4.3-1 shows odor notifications attributed to WRSL facilities and reported to WPWMA from 2012 through 2017, and most of the complaints originated more than 1 mile from the WRSL parcels.

The comment suggests that the Draft EIR “more fully” address impacts of the landfill buffer reduction, and the comment mentions exacerbation of odor impacts. See Master Response 4: Odors for a discussion of the Draft EIR analysis of odor impacts and revisions that have been made to the analysis. The comment requests only that more discussion be provided and does not specify what part of the analysis the commenter finds insufficient or what should be added. The County believes that the analysis as described in Master Response 4 is sufficient under CEQA; therefore, no revisions have been made to the Draft EIR regarding the impacts of the landfill buffer reduction.

- 4-37 The comment raises issues related to the WRSL expansion. See response to comment 4-2.

- 4-38 The comment states that the Draft EIR concludes that mitigation is infeasible because odor impacts are subjective. Master Response 4: Odors explains that the WPWMA Odor Mitigation has now been made a mitigation measure (Mitigation Measure 4.3-6a); however, the mitigation is still infeasible because the County cannot enforce the creation of a fee program or the implementation of the improvements, as explained in Master Response 4.

- 4-39 The comment states the Draft EIR does not mention potential impacts to the City of Roseville wetland preserve areas adjacent to the project and that the County should manage open space areas contiguous with City preserves consistent with the City of Roseville Open Space Preserve Overarching Management Plan (August 5, 2011), submit improvement plans to the City of Roseville for their review and comment, install masonry walls or closed fencing adjacent to City preserves, and design drainage systems so they do not discharge to City preserve areas.

The Draft EIR shows the City’s preserve areas in Exhibit 4.4-1. The PRSP land use plan includes open space preserve in the southwest corner of the site that would connect to City preserve areas; however, low-density residential land use is also planned in this area. Indirect impacts to off-site wetlands are addressed on the Draft EIR (page 4.4-37). Although, the Draft EIR does not quantify the acreage of off-site wetlands, the Draft EIR acknowledges on page 4.4-45 that vernal pool wetlands within 250 feet of proposed development may be subject to indirect effects unless the immediate watershed can be demonstrated to be smaller than 250 feet. This includes wetlands within the City’s preserve areas. Providing the specific wetland acreage would not change the impact conclusions. Also, because the potential impacts would be indirect, even if the specific number of existing vernal pool wetlands were provided, it would not be possible to provide the same level of precision related to the indirect impacts to those wetlands. Rather, the Draft EIR identifies policies that are protective of these areas and identifies mitigation measures to protect these features from indirect impacts.

Several SAP policies and programs are protective of aquatic resources, habitats, and species, including Policy NR-1.1 through NR-1.4, Program NR-4, Policy NR-2.1, Program NR-5, Policy NR-2.3, Policy NR-2.4, Policy NR-2.5, Policy NR-3.1, Policy NR-3.3, Policy NR-3.4, Policy NR-3.5, Policy NR-3.10, Policy NR-4.1, Policy NR-4.2, and Policy NR-4.4. The full text of these policies and programs is provided in the Draft EIR (pages 4.4-31 through 4.4-34). Of these policies and programs, the ones that most specifically address indirect impacts related to construction and operation of the project on vernal pool habitat in City preserves, include SAP Policy NR-2.5, “Setback Area Protection and Maintenance,” which requires no development projects to include provisions within setback areas that are designed to protect natural resources, including prohibition of the placement of fill during or after construction, establishment of a buffer area, and protection of vegetation within the buffer during construction. The policy requires long-term covenants for the protection and maintenance of

setback areas. Regarding operational impacts, SAP Policy NR-3.5, “Stream Protection Best Management Practices and Low Impact Development,” requires the use of feasible and practical best management practices (BMPs) and LID strategies (strategies that promote natural movement of stormwater through preservation of natural landscape features and minimization of impervious surfaces) to protect streams from the adverse effects of construction activities and urban runoff. The policy further requires that LID strategies, which focus on minimizing adverse effects on water quality and surface water runoff, be incorporated into project design. This would reduce potential impacts related to stormwater outfall within existing City preserve areas.

In addition, mitigation for indirect impacts is offered on page 4.4-47 of the Draft EIR, including: “No project construction shall proceed in areas supporting potential habitat for federally listed vernal pool invertebrates, or within adequate buffer areas (250 feet or lesser distance deemed sufficiently protective by a qualified biologist with approval from USFWS), until a biological opinion (BO) and incidental take authorization has been issued by USFWS and the project proponent has abided by conditions in the BO, including all conservation and minimization measures.” This measure would apply to development that could have potential to affect wetlands in the City’s preserve areas.

Therefore, protection measures are already required for wetlands within the City’s adjacent preserve areas. No revision to the Draft EIR is needed. However, in response to public comment, the County has added the following policy to the SAP to further protect adjacent wetlands:

- ▲ **Policy NR-4.5: Construction Management Adjacent to Open Space.** To protect biological resources in designated Open Space areas, either within or adjacent to the Sunset Area, the County shall require development activities to limit disturbance during construction to the minimum area necessary for construction and access and will prohibit fill within any preserved waters of the U.S. and habitat for Endangered Species unless permitted by the Agencies. To ensure this protection, the County will require that the following protective measures be taken prior to or during project construction:

 - A. Improvement plans that show the boundaries and label the Open Space areas
 - B. For projects adjacent to the City of Roseville’s Open Space preserve areas, the County shall coordinate with the City of Roseville to ensure protection of preserve areas consistent with the City’s Open Space Preserve Overarching Management Plan
 - C. Pre-construction meetings for construction occurring adjacent to (within 250 feet) or within Open Space areas to address the presence of the Open Space, the sensitive habitats present, minimization of disturbance to the Open Space, and the requirements for preservation of habitat
 - D. Biological monitor to observe construction activities occurring within 250 feet of adjacent Open Space Preserve unless there is clearly not foreseeable impact to Open Space habitats
 - E. Permits as needed from the Corps, Service, and the County prior to initiation of grading within the open space areas
 - F. Temporary construction fencing will be required prior construction adjacent to or within any Open Space area
 - G. Flagging of preserved wetlands adjacent to construction within the Open Space
 - H. Stormwater pollution prevention BMPs and a Stormwater Pollution Prevention Plan (SWPPP) to prevent pollutant discharges into the Open Space for any project over one acre in size to control sediment and erosion during construction.

I. Temporary stormwater discharge measures (e.g., discharge points, swales) to properly direct flows and ensure that erosion does not take place at any location along the swale or at the point of discharge to avoid discharge into vernal pools and inundation of oak trees.

J. Use of native grasses in post construction revegetation

K. Trash removal and post construction clean-up

L. Post-construction remediation construction impacts as needed

- 4-40 The comment requests that measures consistent with Section 5.2 of the *City of Roseville Open Space Preserve Overarching Management Plan* (provided as an attachment) be incorporated to mitigate potential impacts to biological resources in City preserves adjacent to the PRSP area. See response to comment 4-39.
- 4-41 The comment requests that the County agree with the City that the term “future development” is equivalent to “all SAP and PRSP development” that is reasonably foreseeable, with no exclusions. Page 4.9-22, “Methods and Approach,” of the Draft EIR states, “In determining the level of significance, the analysis assumes that the SAP, including the PRSP, and future developments implemented through these planning documents would comply with relevant federal, state and local ordinances and regulations.” Therefore, the Hydrology and Water Quality section is consistent with this interpretation.
- 4-42 The comment states that the EIR does not, but should, evaluate whether the project would create any increase in off-site stormwater flows that would impact areas known as the Gleason’s and Amoruso Estates. The comment also states that the flows from the PRSP and net SAP areas would be conveyed through the City’s Amoruso and Creekview Specific Plan areas and that additional impacts due to increased peak flows have not been analyzed, particularly before the improvements for these off-site downstream receiving facilities have been constructed. Appendix I for the PRSP, Master Drainage Report, provides a comparison of pre-project to post-project peak flows at the downstream edge of the PRSP property for various design storm event frequencies as required by the Placer County Stormwater Management Manual. As development projects in both the net SAP and PRSP areas are submitted for County review, County staff would require a project-specific final drainage report that would include analysis of the project’s impacts to downstream properties including the effects of the proposed improvements and changes in peak flows and patterns per Placer County General Plan Policy 4.E.11. Additionally, Mitigation Measure 4.9-1b (see revisions shown in response to comment 1-4) requires projects in both the net SAP and PRSP areas to provide project-specific retention and detention. Projects would reduce post-project peak flows to less than pre-project peak flows by providing on-site detention. Projects would also be required to retain project-specific volumetric stormwater increases either on-site, or by participating in a regional stormwater retention program, once established. The project-specific final drainage report would be prepared in conformance with the Placer County Land Development Manual and Stormwater Management Manual and would be submitted with each project’s improvement plans for review and approval by the County. Therefore, off-site stormwater flows would not result in substantial flooding-related impacts in the off-site areas identified in the comment.
- 4-43 The comment states that, because stormwater flows from the PRSP area were not contemplated in the City of Roseville’s EIR for the Pleasant Grove Retention Facility project, Mitigation Measure 4.9-1b is not sufficient for the PRSP area and that additional environmental review would be needed before the Retention Facility can be constructed. The Draft EIR (page 3-69) states that although the City’s proposed volumetric retention basin was evaluated at a program level in an EIR prepared by the City, the SAP/PRSP project would require expansion of the facility beyond its current approved design. This EIR evaluates the potential environmental impacts associated with a larger retention facility. The Draft EIR further states that the City of Roseville, or County/City JPA (or other agreement)

would be the CEQA lead agency for the Pleasant Grove Retention Facility project, and additional CEQA review would be required before the facility could be constructed. Therefore, the Draft EIR appropriately evaluates the potential impacts associated with the Pleasant Grove Retention Facility, and notes that additional CEQA evaluation will likely be necessary for the City of Roseville as lead agency to implement. Acknowledgment of the fair-share development fee is provided under response to comment 4-17. Note that County staff revised Mitigation Measure 4.9-1b as shown in response to comment 1-4.

4-44 The comment states that Mitigation Measure 4.9-1b should be revised to acknowledge that fair-share development fees associated with development of the Pleasant Grove Retention Facility should be required. The comment also provides suggested language to be added to Mitigation Measure 4.9-1b. See response to comment 4-43, above, regarding Mitigation Measure 4.9-1b.

4-45 The comment provides a minor correction to a construction timing statement. In response to this comment, the first full paragraph on page 4.9-28 of the Draft EIR is revised as follows:

The Pleasant Grove Retention Facility would function by diverting water from Pleasant Grove Creek and University Creek into adjacent retention basins during storm events. Stormwater would be retained in these basins until downstream flood events end, after which the stored water would be discharged into Pleasant Grove Creek (CES 2017a). The Lakeview Farms Retention Facility would accept stormwater runoff during high flows and allow infiltration in large, constructed wetlands. The Pleasant Grove Retention Facility is currently proposed as two large basins with a combined capacity of 3,461 acre-feet (CES 2017a). The Lakeview Farms Retention Basin would be a single large basin and would be expanded in phases. The first phase ~~(currently planned for construction in 2018)~~, (expected to begin construction in 2020) would hold 1,080 acre-feet of stormwater. The second phase would expand the facility to hold 2,800 acre-feet of stormwater, which would meet the projected needs of the City of Lincoln at buildout. The third and final phase could expand the facility to hold as much as 4,000 acre-feet of stormwater (CES 2017b). Both facilities would require expansion of their planned retention basins to accommodate future projected municipal flows and flows from the net SAP area. Technical studies prepared for the SAP found that both the Pleasant Grove and Lakeview Farms Retention Basins can be expanded to meet the stormwater retention needs of the SAP (CES 2017a, 2017b). Exhibit 3-23 shows the location of the potential regional stormwater retention facilities. Any changes to the Pleasant Grove or Lakeview Farms Retention Facility would occur only through the review and planning process of the appropriate jurisdictions (City of Roseville for the Pleasant Grove Retention Facility and the City of Lincoln for the Lakeview Farms Retention Facility). (It should be noted that, as part of these review and planning processes, the retention facilities would all be designed and engineered according to applicable federal, state, and city standards, which would minimize potential for failure of a levee wall or other facility that could cause flooding of downstream properties.)

This correction provides minor clarification and does not change the analysis or conclusions of the Draft EIR.

4-46 The comment recommends that the County add a statement to the end of Mitigation Measure 4.9-1a to require public review period comments to be addressed within the final drainage report. Public review period comments are addressed in this Final EIR. No change to mitigation measure language is necessary.

4-47 The comment states that the EIR should be revised to disclose the location of the project area's existing 100-year floodplain in order to fully analyze the potential downstream impacts in the City of Roseville. Further, the comment suggests revisions to SAP Policies PFS-5.6 and NR-3.2 regarding future floodplain mapping. The net SAP area was analyzed at a programmatic level and thus does not contain the level of detail regarding project-specific development needed to determine impacts

to the floodplain. Mitigation Measures 4.9-1a, 4.9-1b, and 4.9-5a -5c address impacts to the floodplain by requiring that a project-specific drainage report be submitted with any improvement plans and that project-specific detention and retention requirements be satisfied. Note that County staff revised Mitigation Measure 4.9-1b as shown in response to comment 1-4.

The PRSP area was analyzed at a project level. A master drainage report was prepared and included as Appendix I. Plate 2 of Appendix I depicts the existing 100-year floodplain. Plates 4 and 5 depict the proposed 100-year floodplain as mitigated and unmitigated, respectively.

The SAP includes areas of the Federal Emergency Management Agency (FEMA) Special Flood Hazard Area Zone A, for which the floodplain elevations are not yet determined. The net SAP area was analyzed at a programmatic level and mitigation measures are included to ensure that future project submittals are analyzed at a project level that address the commenter's concerns. SAP Policy NR-3.2: Floodplain Compliance, states, "The County shall require all development in the FEMA or calculated 100-year floodplain to comply with the provisions of the Placer County Flood Damage Prevention Ordinance." This Ordinance provides for definitions to calculate the limits of the floodplain. The use of "100-year future, fully developed floodplain" requirements in the Pleasant Grove Creek area has largely been modified because of the nature of the watershed being undeveloped prior to development. Project-specific versions of this analysis are generally created and utilized as a significant amount of the detention/attenuation in this watershed occurs naturally. The project does propose to expand the development parameters of future studies to include the developed areas of these projects.

Policy PFS-5.6 was drafted based on past discussions between County and City staff regarding the Pleasant Grove Retention Facility. Utilization of the current 100-year, 8-day storm methodology references a 1998 agreement between Sutter County and the City of Lincoln, but the policy identifies the possibility that a different, agreed-upon methodology could be used. County and City staff recognize that further future discussions are needed between the various jurisdictions in order to determine the appropriate agreed upon methodology referred to in Policy PFS-5.6.

- 4-48 The comment requests verification that Appendix D of the Draft EIR includes all updated Volumetric Retention Studies. Appendix D includes the following Volumetric Studies: North Canal Tributaries Mitigation – Lakeview Farms at Coon Creek dated September 25, 2017; Placer Ranch Onsite Mitigation dated September 19, 2017 and revised on September 26, 2017; North Canal Tributaries Mitigation – Scilacci Farms at Coon Creek dated September 20, 2017 and revised on September 26, 2017; Pleasant Grove Creek – Regional Volumetric Mitigation dated September 18, 2017 and revised September 26, 2017 and September 29, 2017. These are the correct technical studies.
- 4-49 The comment states that the Draft EIR conclusion regarding odor-related land use impacts is incorrect because the commenter asserts that payment of fair share fees is a feasible mitigation measure. Master Response 4: Odors explains that the WPWMA Odor Mitigation has now been made a mitigation measure (Mitigation Measure 4.3-6a); however, the mitigation is still infeasible, as explained in Master Response 4. Regarding analysis of potential landfill expansion, see response to comment 4-2.
- 4-50 The comment states that mitigation measures related to the RPP2 on page 4.11-34 of the Draft EIR do not include specific performance criteria to ensure adequate sound attenuation. The comment further suggests that the mitigation should include additional requirements for the specific plan developers to be responsible for mitigation, for the sound wall to comply with City of Roseville Construction Standards, and that the mitigation measure should be revised to specify Placer County noise standards be achieved.

As discussed in response to comment 4-12, Mitigation Measure 4.11-4b on page 4.11-36 of the Draft EIR provides specific performance criteria (i.e., Placer County noise standards) to ensure noise levels at future planned receptors would not disturb sensitive land uses or exceed Placer County noise standards. After additional consideration, Mitigation Measure 4.11-4b was revised to remove

the 5-dB reduction requirement for the sound wall and rely on the performance criteria of achieving the Placer County noise standards. Mitigation Measure 4.11-4b on page 4.11-36 of the Draft EIR is revised as follows:

Mitigation Measure 4.11-4b: Reduce exposure to new sensitive land uses from the existing Roseville Power Plant 2 (PRSP Area)

- ▲ Before approval of small-lot tentative maps, the project proponent shall demonstrate that the building occupants of new residential or other sensitive land use within the PRSP area are not exposed to noise levels from the RPP2 that exceed Placer County land use compatibility standards (e.g., 60 dBA L_{dn} /CNEL for residential uses), daytime and nighttime noise limits for sensitive receptors (i.e., 45 dBA L_{eq} /65 dBA L_{max} [night], 55 dBA L_{eq} /70 dBA L_{max} [day]).
- ▲ If achievement of the Placer County noise standards cannot be met by providing adequate setback of at least 590 feet from the RPP2 (i.e., distance at which nighttime L_{eq} standard is met), then the County shall require the developer to construct, at developer's costs, a sound wall between the existing RPP2 and any new sensitive receptors. The sound wall shall be designed by an acoustical engineer and constructed and placed in a manner that achieves, at a minimum, a 5-dB reduction in sound. The wall design shall be coordinated with the City of Roseville. The wall or a combination of wall and setbacks, shall result in achievement of Placer County noise standards.

As discussed on page 4.11-36, the only noise standard that is currently being exceeded at locations where future receptors could be placed is the Placer County nighttime standard of 45 dBA L_{eq} . A reduction of 5-dB would ensure that all Placer County noise standards are achieved. Further, the mitigation specifically identifies the project proponent as the responsible party for implementation of mitigation related to the RPP2. Finally, the project is located within Placer County and mitigation has been incorporated that ensures the noise levels from the existing RPP2 would not exposure future planned receptors within Placer County to noise levels that exceed applicable noise standards. Considering the project is within Placer County and not the City of Roseville, the design of the sound wall would be subject to County approval, not City of Roseville approval. Placer County would ensure that construction of the sound wall meets all requirements set forth by Mitigation Measure 4.11-4b and applicable Placer County code. No changes are necessary.

- 4-51 The comment states that the City of Roseville is currently providing a disproportionate level of service for calls in Placer County to backfill services in the SAP area and this effect on City of Roseville fire services is not addressed in the Draft EIR. The comment further suggests that the mitigation measures be revised to include performance standards for determining the effectiveness of the mitigation measure and that additional information regarding timing, size and location of fire stations to serve the project. Fire protection services for the net SAP and PRSP areas are provided by Placer County Fire. Placer County has a full-service contract with the California Department of Forestry and Fire Protection to provide fire protection services, including but not limited to structural and wildland fire protection, dispatch services, fire inspections, basic and advanced life support emergency medical services. Placer County Fire also has mutual aid agreements with other jurisdictions and entities including the City of Roseville, and through these agreements, the Placer County Fire Department would be able to receive assistance if needed. The City of Roseville has entered into the Western Placer County Cooperative Fire Services Response Agreement Operational Plan along with other local fire departments and fire districts. This operational plan is designed to provide personnel from each agency a means for executing the Western Placer County Cooperative Fire Service Response Agreement. In addition, this plan outlines procedures and guidelines for the signatory agencies in delivering efficient initial response regardless of jurisdictional boundaries.

Placer County Fire Station 77 is located on Athens Avenue in the SAP area. This station provides first-level fire and emergency response for the project area and is staff with Advanced Life Support

municipal fire protection delivery models. Chapter 3 of the Draft EIR, “Project Description,” notes that a new fire station is required to be included in the PRSP area to accommodate increased demand for fire protection services. The timing and triggers for the fire station in the PRSP area and the provision of fire protection and emergency services to the Sac State–Placer Center would be subject to provisions noted in the PRSP Development Agreement. The PRSP notes on page 8-10, if it is determined that an on-site fire station is needed to serve the PRSP area, one can be accommodated on CP parcel PR-71 or on any parcel with a General Commercial, Commercial Mixed Use, or Campus Park land use designation. Mitigation Measure 4-13-1b requires that the specific locations for the fire stations and fire station design be identified and coordinated with the Placer County Fire Department. The fire stations would be constructed as needed to serve development and maintain staffing ratios.

The PRSP area is located entirely within the future annexation area of Placer County’s Community Facilities District 2012-1 to fund maintenance and operation of fire and emergency services within SAP. Mitigation Measure 4-13-1a requires the creation of a Community Facilities District, County Service Area Zone or Benefit or annexing into an existing CSA Zone of Benefit or combination thereof for the purposes of funding supplemental revenue for operations, training, maintenance and personnel costs to provide fire protection and emergency response services.

The net SAP area is located within the Placer County Fire Facilities Fee area, and the PRSP area would annex into the fee program to provide a funding mechanism for the construction of fire and emergency service facilities. See response to comment 4-5 regarding timing and performance standards.

4-52 The comment raises a number of issues related to law enforcement impacts and expresses concern that the direct connection between the project area and the City of Roseville would create the impression that law enforcement services would be provided by the City of Roseville. Specific concerns include increased 911 emergency calls routed to the City of Roseville, the need for additional California Department of Highway Patrol (CHP) services, law enforcement staffing, and emergency response times. Responses are provided below for each of these issues.

- ▲ 911 calls. As stated in the Draft EIR (page 4.13-20), the police-to-population ratio established by the Placer County General Plan is 1.0 officer per 1,000 population for unincorporated areas. However, for new growth areas, the sheriff’s department utilizes a standard of 1.2 officers per 1,000 population as a threshold to determine adequate service. In addition, the Draft EIR analysis assumes maintenance of the current response time: approximately 8 minutes or less for an emergency call. Placer County uses these service standards to determine the additional law enforcement staff and facilities necessary to serve a proposed project. This would include staff and facilities necessary for response to 911 calls within the project area. To determine significant impacts associated with police protection service, the Draft EIR (4.13-19) uses a threshold of significance based on whether the project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services. The increase in demand for police protection would not result in the need to construct expanded or additional stations, such that a substantial adverse effect would result (that has not already been evaluated in this or other EIR). Therefore, no addition analysis is needed.
- ▲ CHP demand. The Draft EIR states (page 4.13-28) that although implementing the SAP would increase the number of vehicles on SR 65, the SAP does not propose changes to SR 65 that would increase the service area for the CHP. State service providers, such as CHP, are funded in part by property taxes. Development of the net SAP area would increase property taxes paid to the State of California that could fund an increase in CHP staffing levels. Implementing the SAP would not be anticipated to increase demand for CHP services such that expansion of CHP

offices would be required. Although the commenter suggests that increased traffic associated with the project would result in increased response from Roseville Police Department and Roseville Fire Department for collisions within the city, the comment does not draw a nexus between that increased response and the need for increased demand for CHP. The Draft EIR appropriately evaluates impacts to law enforcement services, including CHP. See discussion above regarding the threshold of significance for police protection services. No revisions are necessary.

- ▲ Police staffing. The comment suggests that the Draft EIR indicates that 19 new officers would be required to meet the law enforcement officer-to-population ratio. Using an officer-to-population ratio of 1:1,000, the commenter indicates that, for a project introducing 24,000 new residents, the actual number should be 24 new officers. There are several incorrect statements made in this comment. The Draft EIR (page 4.12-10) indicates that the project would generate 19,314 new residents (not 24,000). It states that the County's officer-to-population ratio is 1:1,000; however, as described above, for new growth areas a standard of 1.2:1,000 is used (Draft EIR page 4.13-20). Using the appropriate service ratio, the Draft EIR (page 4.13-28) identifies the need for 23.2 new officers to support the project (not 19). This is close to the 24 new officers suggested by the comment. Also, as described in the Draft EIR, the Sac State-Placer Center would provide its own law enforcement. The fact that Sac State-Placer Center students may live outside the project area (including within the city) is not different than any other proposed land use which involves employees or visitors that would use a component of a project and live elsewhere. Those services would be paid for via property taxes or other taxes/fees associated with the place of residence. General impacts associated with population growth are evaluated in Section 4.12 of the Draft EIR, "Population, Employment, and Housing," and also in the "Growth Inducement" discussion in Chapter 5, "Other CEQA-Mandated Sections." See response to comment 4-5 for a discussion of mitigation timing. No revision to the Draft EIR is necessary.
- ▲ Response times. The comment suggests that the project would result in law enforcement staffing below County standards and that response times would not be maintained. As discussed above, the comment did not correctly interpret the Draft EIR's analysis of law enforcement service ratios. Regarding response times, the Draft EIR states (page 4.13-28) that the Placer County Sheriff's Office currently has sufficient staff to meet existing law enforcement services and currently meets County response time goals (Barnhart, pers. comm., 2017). The Draft EIR further states (page 4.13-28) that as development is constructed, the Placer County Sheriff's Office anticipates redrawing the boundaries for the beats that serve the net SAP area to add more officers and maintain the response time standards for emergency calls (Barnhart, pers. comm., 2017). See discussion above regarding the threshold of significance for police protection services. No revisions to the Draft EIR are necessary.

4-53 The comment expresses concern that project development would increase demand on the City of Roseville's Martha Riley Community Library. This comment is based on the significant number of cardholders who live outside of Roseville. The comment concludes with concern that the lack of commitment from the future university to make its library open to the public and no funding for a library within the project area must be addressed. Comments indicate City of Roseville desires funding for its library system. Page 4.13-18 of the Draft EIR notes that the County requires the collection of Capital Facilities Fee to mitigate impacts caused by new development in the county. The fee revenue is used to maintain per-capita facility standards for facilities such as libraries. Facilities to be funded under the fee program include expansion and construction of libraries. The SAP, including the PRSP, is required to pay this fee to mitigate impacts caused by new development. The Draft EIR (page 4.13-21) identifies SAP Policies PFS 2.2 through 2.4, which provide the direction to collect both capital and operational funding from new development to offset impacts to public services. Also, Mitigation Measure 4.13-4 requires the creation or annexation of development into a Community Facilities District, County Service Area Zone of Benefit, or annexation into an existing zone of benefit for the purpose of funding supplemental revenue for library facilities. Note that the

County has revised Mitigation Measure 4.13-4 to require additional interim library service. See Chapter 2, “Revisions to the Draft EIR,” for the revised mitigation measure text.

- 4-54 The comment expresses concern about Impact 4.13-5 of the Draft EIR. Specific concerns include parkland credit for privately-owned land, residential units in the SAP area, insufficient little league fields and soccer fields, and Roseville parks that were not listed in the Draft EIR. Table 4.13-9 in the Draft EIR summarizes the parks and open space requirements for net SAP area. Requirements are based on an estimated population of 6,095 residents in the net SAP area. As noted on page 4.13-36, “Because the net SAP area has sufficient space and opportunity to comply with Placer County General Plan and SAP policies for provision of sufficient active and passive parkland and would be required to do so, impacts to parks and recreation would be less than significant.” Also, the net SAP area has been analyzed at a programmatic level and does not include evaluation of specific recreation facilities such as sports fields. Development projects proposed within the net SAP area are evaluated against General Plan and SAP policies at time of submittal of an application. When the application is submitted in the net SAP area, the proposal would be required to comply with the General Plan and SAP requirements for parkland provision, including provision of specific recreation facilities, such as sports fields. For the PRSP, Table 4.13-10 on page 4.13-36 of the Draft EIR summarizes parks and open space requirements and credits for the PRSP. The PRSP would provide a total of 69.77 active acres of parks. Included within the 69.77 is 7.23 acres of land provided for private recreation facilities. These private recreation areas are given a 50-percent credit in meeting the County’s active parkland requirements. The total amount of credited acreage is 66.10 acres which meets the County’s General Plan standards.

The Draft EIR includes evaluation of impacts associated with regional parks. As stated on page 4.13-38 of the Draft EIR, future development in the net SAP and PRSP areas would pay in-lieu fees, dedicate parkland, and/or construct parks and recreation facilities in compliance with Placer County requirements and to meet the future SAP demand for parks and recreation facilities. Additionally, park facilities could be constructed in the project area to meet the needs of residential development in the net SAP and PRSP areas, or appropriate in-lieu fees would be paid if on-site recreation requirements are infeasible. In-lieu fees would include fair-share contribution to development of regional parks in the area. No revisions to the Draft EIR are necessary.

- 4-55 The comment suggests that the Draft EIR must address cumulative impacts to City of Roseville parks. The Draft EIR evaluates cumulative impacts on parks and recreation facilities. Specifically, Cumulative Impact 4.13-13 evaluates the project’s potential contribution to cumulative impacts on parks and recreation facilities (including regional park facilities) along with other proposed and approved development in the area. Cumulative Impact 4.13-13 concludes that because the County’s active and passive park standards would be met by future development in the project area through construction of park facilities, payment of in-lieu fees, contribution to regional recreation facilities, and dedication of land for parks, implementing the project would not result in a considerable contribution to a cumulative impact on parks and recreation facilities.
- 4-56 See response to comment 4-4 regarding the extension of Foothills Boulevard.
- 4-57 The comment expresses concern regarding the inclusion of major roadway projects included in the cumulative traffic analysis and suggests the development of a phasing plan to identify the timing of roadway improvements. The cumulative traffic analysis includes transportation improvements that are documented in the financially constrained project list of SACOG’s 2036 MTP/SCS. Therefore, these transportation improvements are considered reasonably foreseeable. The commenter’s request for a phasing plan is noted.
- 4-58 The comment expresses concern about including 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 in the traffic model. The comment suggests that these roadways should be removed from the model because they are minor roadways

traveling through residential areas. Crocker Ranch Road represents the shortest route between Fiddymment Road north of Angus Road and Blue Oaks Boulevard east of Crocker Ranch Road. Despite its lower speed, it is a shorter travel time route than remaining on Blue Oaks Boulevard and Fiddymment Road to travel between the same end points, as demonstrated by Google Maps and GPS navigation. The links representing Crocker Ranch Road and Angus Road are also included in the City of Roseville's traffic forecasting model and have been included in the traffic forecasting models for the Amoruso Ranch Specific Plan EIR, the Campus Oaks traffic study, and other recent traffic analyses for the City of Roseville to reflect their function as residential collector streets. It is the function of the traffic forecasting model to recognize that Crocker Ranch Road is the shortest route for trips between these two arterial roadways. There are no physical barriers that prevent vehicles from using Crocker Ranch Road as a route between Fiddymment Road and Blue Oaks Boulevard. Therefore, the traffic forecasting model is accurate in showing both existing and forecasted future trips using it as a likely route between these two arterial roadways.

Similarly, Parkside Way and Northpark Drive are also included in the City of Roseville's traffic forecasting model and have been included in the traffic forecasting models for the Amoruso Ranch Specific Plan EIR, the Campus Oaks traffic study, and other recent traffic analyses for the City of Roseville. Although these are local roadways, they along with Opal Drive and Diamond Creek Boulevard have been included in the City of Roseville traffic forecasting model because they function as residential collector streets that collect trips from the residential neighborhoods near Diamond Creek Elementary School and deliver them to arterial roadways, such as Woodcreek Oaks Boulevard, Fiddymment Road, and Blue Oaks Boulevard.

Because these roadways are local residential collectors, the traffic forecasting model codes them accordingly with lower speeds and capacity, generally making them less attractive than higher speed and higher capacity arterial roadways. However, the traffic forecasting model predicts that the addition of project trips to Woodcreek Oaks Boulevard results in substantially over capacity conditions on Woodcreek Oaks Boulevard across the existing two-lane bridge between Tradewinds Drive and Deschutes Drive. Therefore, the forecasting model predicts that some trips would divert to Parkside Way to access Blue Oaks Boulevard, which some trips are likely to use to avoid the overly congested condition on Woodcreek Oaks Boulevard. It is this traffic condition that triggers the need for the Foothills Boulevard extension, as described in Mitigation Measure 4.14-1b.

Therefore, because these roadways serve as collector roadways and have been included in multiple previous traffic analyses for the City of Roseville, they are also appropriate to include in this traffic analysis. They also more accurately forecast the actual routes trips would use when considering travel times between trip origins and destinations and anticipated congestion on major arterial roadways.

- 4-59 The comment expresses disagreement with the inclusion of certain transportation improvements in the cumulative traffic analyses presented on pages 4.14-94 and 4.14-95 of the Draft EIR. The cumulative traffic analysis includes transportation improvements that are documented in the financially constrained project list of SACOG's 2036 MTP/SCS. Therefore, the County has determined that these transportation projects are reasonably foreseeable. This includes full buildout of the I-80/SR 65 interchange improvements and Placer Parkway Phase 2.

Placer Parkway would be constructed through the PRSP and net SAP areas. Because development in the PRSP and SAP areas would contribute funding to Placer Parkway via the SPRTA fee, the County asserts that Placer Parkway would not have sufficient funding without development of the net SAP and PRSP areas. The cumulative plus project traffic analysis includes Placer Parkway Phase 2 based on future development levels included in this cumulative scenario, and its inclusion in the SACOG 2036 MTP/SCS financially constrained project list.

The widening of Riego Road is based on forecasted development of Sutter Pointe, which is included in the travel forecasting model and reflected in SACOG's 2036 regional projections.

The extension of Blue Oaks Boulevard to Santucci Boulevard is included in the City of Roseville's traffic forecasting model and has been included in the traffic forecasting models for the Amoruso Ranch Specific Plan EIR, the Campus Oaks traffic study, and other recent traffic analyses for the City of Roseville. It is also consistent with buildout of the Roseville General Plan. Therefore, this analysis includes this extension to be consistent with previous traffic analyses completed for the City of Roseville.

- 4-60 The comment expresses concern with the proposed LOS policy (Policy TM-1.2) in the proposed SAP. The comment also identifies potential inconsistencies in the width and number of lanes on two major roadways (Sunset Boulevard and Campus Park Boulevard) that connect the PRSP area to the City of Roseville's Amoruso Ranch Specific Plan (ARSP) and suggests that these roadways be widened to four lanes to be consistent with the ARSP and reduce demand on Fiddymont Road and Woodcreek Oaks Boulevard. The travel forecasting model used for the Draft EIR analysis included the development of the ARSP and showed that the two lanes proposed for Sunset Boulevard and Campus Park Boulevard are sufficient to serve the forecasted cumulative plus project traffic volumes. Even if these roadways were widened to four lanes, the travel forecasting model showed that traffic demand on Fiddymont Road and Woodcreek Oaks Boulevard would not noticeably change since the roadways already have excess capacity as two-lane roadways. Therefore, it is appropriate for these roadways to remain two lanes as proposed in the PRSP.

Placer County will work with the City of Roseville to ensure an appropriate transition from the proposed roadway cross-sections in the PRSP area to the proposed roadway cross-sections in the ARSP.

- 4-61 The comment notes that several City of Roseville intersections analyzed as unsignalized intersections were recently (or soon will be) signalized (i.e., between 2018 and 2019). The traffic analysis considers traffic conditions at the time the notice of preparation (NOP) was released in November 2016. At that time, the intersections identified in the comment were not signalized, and therefore are analyzed as stop-controlled intersections. Table 4.14-24 of the Draft EIR shows that the Woodcreek Oaks Boulevard/Crimson Ridge Drive intersection operates at an acceptable LOS with side-street stop-control; therefore, it would operate at an acceptable LOS C or better as a signalized intersection. As noted in Impact 4.14-4, the study acknowledges that signalization of Woodcreek Oaks Boulevard/Painted Desert Drive restores operations to an acceptable LOS.

Mitigation Measure 4.14-4 shows that the proposed project would be responsible for paying impact fees that constitute a fair-share contribution toward the signalization of the Woodcreek Oaks Boulevard/Northpark Drive and Woodcreek Oaks Boulevard/Parkside Drive intersections, as described in the comment.

The signalization of these intersections would increase the percentage of signalized intersections operating at LOS C or better.

- 4-62 The comment notes that a few of the LOS exceptions identified in Placer County's Dry Creek/West Placer Community Plan were recently annexed into the City of Roseville and should be analyzed using the City of Roseville's LOS policy/standards. Page 16 of Appendix M: Sunset Area Plan and Placer Ranch Specific Plan Transportation Impact Study clarifies that the Baseline Road/Walerga Road/Fiddymont Road and Baseline Road/Watt Avenue intersections are now under the City of Roseville's jurisdiction; and therefore, the traffic impacts at these intersections are based on the City of Roseville's significance criteria (i.e., City of Roseville level of service policy/standards). The comment also identifies Baseline Road – Sutter County Line to Walerga Road/Fiddymont Road. The segment east of Watt Avenue is within the City of Roseville and therefore the operations along this segment are not analyzed according to County standards. The segment west of Watt Avenue remains in the unincorporated County and is evaluated using County standards.

- 4-63 The comment notes that the City of Roseville General Plan LOS Policy incorrectly omitted a reference to the a.m. peak hour. To correct this omission, Level of Service Policy 1 on page 4.14-29 of the Draft EIR is revised as follows:
- ▲ **Level of Service Policy 1:** 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.
- 4-64 The comment notes that the City’s LOS policy applies to both roadway segments and intersections; and that the City relies on its intersection LOS criteria to determine roadway width needs. The comment expresses concern that roadway segment impacts are not identified in the Draft EIR. Consistent with this comment, the Draft EIR analyzes traffic impacts to City of Roseville facilities based on the City’s intersection LOS criteria. These criteria and methodology are consistent with the City of Roseville’s previously adopted environmental documents, which similarly do not quantitatively analyze roadway segment operations for City of Roseville roadways. However, pages 75-76, 110-112, 180-181, and 220-221 of the Transportation Impact Study (Appendix M of the Draft EIR) describe the project’s effect on key roadway segments in the City of Roseville. Based on these effects, the Transportation Impact Study identifies potential roadway widening projects that may be considered to serve the traffic increases generated by the proposed project.
- 4-65 The comment notes that Impact 4.14-4 in the Draft EIR states that signal warrants are met until the Foothill Boulevard extension is completed, and requests that a signal be installed at Woodcreek Oaks Boulevard/Parkside Way and Woodcreek Oaks Boulevard/Northpark Drive intersections to address near-term impacts. Impact 4.14-4 in the Draft EIR discloses the project impacts to traffic conditions at the Woodcreek Oaks Boulevard/Northpark Drive and Woodcreek Oaks Boulevard/Parkside Way intersections, as described in the comment. Mitigation Measure 4.14-4 commits project proponents to pay impact fees that constitute the project’s fair-share contribution toward the installation of traffic signals at these intersections.
- 4-66 The comment notes that the proposed SAP does not mention Intelligent Transportation Technology/Systems (ITS) within its goals and policies outside of Policy TM-1.11 and suggests that ITS technology be incorporated into the transportation plan. The County will consider ITS in the implementation of the transportation network. This comment raises policy considerations and does not identify issues related to the EIR’s analysis or adequacy.
- 4-67 The comment suggests that the County work with adjoining agencies when updating the commercial truck routes (STAA) to ensure adequate routes are provided to the local freeway system. The County will coordinate with adjoining agencies where commercial truck routes (STAA) cross from the county into adjoining local jurisdictions.
- 4-68 The comment inaccurately states that Exhibit 4.14-9 in the Draft EIR only shows an increase of 40 new trips on Fiddymment Road between Pleasant Grove Boulevard and Blue Oaks Boulevard. The comment also inaccurately asserts that page 4.14-49 of the Draft EIR states this segment of Fiddymment Road would operate at LOS D, E, or F. Exhibit 4.14-9 shows that Fiddymment Road between Pleasant Grove Boulevard and Blue Oaks Boulevard is forecasted to experience an increase of over 30,000 daily trips. Similarly, page 4.14-49 of the Draft EIR refers to the segment of Fiddymment Road north of the Roseville city limits (and over a mile north of the segment between Pleasant Grove Boulevard and Blue Oaks Boulevard) when identifying roadway segments that would operate at LOS D, E, or F.
- 4-69 The comment expresses concern that the timeline identified for Phase 1 of Placer Parkway on page 4.14-50 of the Draft EIR is unrealistic. The comment inaccurately states that construction design

documents have not been started to support this claim. The comment also requests that language be added which requires Phase 1 of Placer Parkway be completed before issuing residential building permits for development beyond 25 percent of the PRSP area. Page 4.14-50 of the Draft EIR discloses that the project would have a significant and unavoidable impact in the short-term if more than 25 percent of the PRSP area is developed and Phase I of Placer Parkway is not yet completed and open to traffic. The Draft EIR acknowledges and discloses this impact and also recognizes that this impact would be reduced to less than significant upon completion of Phase I of Placer Parkway, regardless of whether this occurs in 2022 or shortly thereafter. This significant short-term impact does not preclude the County from proceeding with development in the PRSP area. The County is proceeding in the construction design phase of Phase 1 Placer Parkway and anticipates 90 percent construction plans will be completed in fall 2019.

- 4-70 The comment notes that the Draft EIR states there is a timing gap between when significant impacts to City of Roseville facilities occur and when funds for mitigation will be available. The comment also requests that other feasible mitigation be identified to reduce the impact at the time it occurs. Page 4.14-51 of the Draft EIR acknowledges and discloses that this impact is significant and unavoidable in the short-term until the Foothills Boulevard extension is constructed. The Draft EIR also recognizes that this impact would be reduced to less than significant once the Foothills Boulevard extension is constructed. This significant short-term impact does not preclude the County from proceeding with development in the PRSP area. Additional mitigation beyond what is already identified in the Draft EIR would have a short-term use and become obsolete once Foothills Boulevard is extended. Therefore, additional mitigation is not prudent.
- 4-71 The comment notes that the Draft EIR does not discuss whether a traffic signal at the Watt Avenue/PFE Road intersection is within the Sacramento County capital improvement program (CIP). This comment inaccurately conveys that the Watt Avenue/PFE Road intersection is in Sacramento County. The Watt Avenue/PFE Road intersection is within Placer County and is included in the Dry Creek Benefit District of the Placer County Countywide CIP, as described on page 4.14-55. The County is collecting traffic impact fees from development in the Dry Creek Benefit District, which will ultimately fund the signalization of this intersection.
- 4-72 See response to comment 4-3 regarding the percentage of signalized intersections operating at LOS C or better and improvements not identified in the City's CIP.

The comment notes that the SAP includes an LOS policy establishing LOS E as the standard within the SAP and asserts that this is in conflict with the City/County memorandum of understanding (MOU). However, the City/County MOU does not apply to the SAP area.

The comment also expresses concern that the project would accelerate the timing of improvements that are identified in Mitigation Measure 4.14-3 and within the City's CIP. The fair share funding process described in Mitigation Measure 4.14-3 would supplement the City impact fees used to fund improvements within the City's CIP, assuming a fair and reasonable arrangement is reached between the County and City. This additional funding would allow improvements to proceed sooner than if these improvements were solely reliant on City impact fees, and would address the timing issues raised by the comment.

Subsection (a) of comment 4-72 incorrectly infers that the net SAP and PRSP areas are included within the boundaries of an MOU between the City of Roseville and Placer County and that Exhibit C, Roadway LOS development standards described in that MOU are applicable to the net SAP and PRSP areas. The net SAP and PRSP areas are both outside of the boundaries that the MOU covers.

See response to comment 4-22 regarding signal timing optimization. The Draft EIR mitigation analysis considered the additional delay added to lower volume movements and found that the signal timing adjustments result in an overall net benefit to traffic operations at intersections where signal timing optimization is listed as a mitigation measure. This includes their effect on signal

coordination along major corridors, including the Blue Oaks Boulevard, Douglas Boulevard, Pleasant Grove Boulevard, and Roseville Parkway corridors listed in the comment.

The comment expresses concern regarding Mitigation Measure 4.14-3 regarding adding right-turn overlap phases and prohibiting U-turn movements. As described in Impact 4.14-17 of the Draft EIR, the cumulative plus project traffic analysis shows that U-turn prohibitions at most City of Roseville intersections would not be necessary when reasonably foreseeable regional roadway improvements are considered, including the four intersections listed in the comment. The traffic generated by the proposed project would occur over an extended period of time, and the 20-year land use development totals that are included in the EIR's cumulative plus project analysis would occur together with these regional roadway improvements.

The comment also expresses opposition to additional intersection widening at several locations. As described in Mitigation Measure 4.14-17 of the Draft EIR, the additional intersection widening at the three intersections listed in the comment would not be necessary when reasonably foreseeable regional roadway improvements are considered, as shown in the cumulative plus project traffic analysis.

- 4-73 See response to comment 4-3 regarding fair-share funding for improvements at City of Roseville locations.

The comment expresses concern that Mitigation Measures 4.14-3 and 4.14-4 do not commit the County to specific actions, contain extraneous information regarding a possible formation of a JPA and reciprocity, and do not specify that funds would be held in trust for the City of Roseville for the expressed purpose of improving the specified facilities within the City. In response to this comment, Mitigation Measures 4.14-3 and 4.14-4 on pages 4.14-64 and 4.14-71, respectively, of the Draft EIR are revised as follows:

Placer County, in working with the City of Roseville to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Roseville to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Roseville intersections. In reaching an accommodation with the City of Roseville, the County and City, in order to better ensure an effective sub-regional approach to mitigating transportation-related impacts, may choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that "fair share" fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers, must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County's transportation network. Any such arrangement(s), with ~~just~~ the City of Roseville or with additional agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels. Placer County shall hold these fees collected for improvements within the City of Roseville in trust for the expressed purpose of funding improvements to the specified facilities within the City.

- 4-74 The comment requests that various figures in the SAP be updated to show the Foothills Boulevard extension. As an area plan, the SAP does not identify specific off-site improvements on the figures. No changes to the SAP are necessary.

The comment requests that Exhibit 3-5 of the Draft EIR should be revised to show the Foothills Boulevard extension. However, Exhibit 3-5 shows the SAP land use diagram and for the same reasons described above does not show specific off-site improvements. Off-site improvements are shown in Exhibit 3-24. Also, the comment indicates that the Foothills Boulevard extension is shown in Exhibit 3-24, but not described in the Draft EIR. The Draft EIR includes a description of the Foothills Boulevard extension of page 3-21 and page 3-72.

The comment indicates that Exhibits 4.14-6 and 4.14-7 show the Foothills Boulevard extension as a four-lane roadway instead of the six-lane roadway described in the Draft EIR. Both Exhibit 4.14-6 and 4.14-7 show Foothills Boulevard as a six-lane roadway in the PRSP area and does not show the number of lanes for the off-site extension but shows the extension as a “Future Roadway.” The Draft EIR is not internally inconsistent.

Finally, the comment states that figures in the Traffic Impact Study are inconsistent. Fehr & Peers reviewed the figures in the Traffic Impact Study and verified that they are accurate.

- 4-75 The comment expresses concern that project residents may rely on City of Roseville Transit services, and that the Draft EIR does not evaluate potential impacts to City of Roseville Transit. The project’s transit impacts are disclosed in Impact 4.14-13 of the Draft EIR, which acknowledges that the increase in population, employment, students, and attractions would result in an increased demand for transit use. The Draft EIR describes the existing transit service and acknowledges that Roseville Transit provides limited service to the SAP area on page 4.14-22 of the Draft EIR. Therefore, Mitigation Measure 4.14-13a establishes that Roseville Transit will be consulted when the County prepares a transit master plan for the SAP area. Mitigation Measures 4.14-13a and 4.14-13b in the Draft EIR commit Placer County to adequately plan for and fund transit services for the net SAP and PRSP areas. As a member of the Placer County Transportation Planning Agency, the City will be able to participate in the Long Range Transit Master Plan effort referred to in Policy TM-3.1.

The project and this analysis do not commit Roseville Transit to expand service into the net SAP and PRSP areas. Existing ridership numbers show plenty of available capacity on Roseville Transit’s fixed route bus lines. Should Roseville Transit decide to expand service into the SAP area, including the PRSP area, the system’s available capacity combined with the transit master plan would ensure that the project would not impact Roseville Transit service.

- 4-76 The comments suggest that the project would reduce the lifespan of the WRSL and that the Draft EIR did not examine impacts on the MRF. The comment recommends mitigation requiring the project to pay its fair share for landfill expansion. Finally, the comment states that the Draft EIR did not examine the full buildout of the SAP on solid waste disposal. This is incorrect. The Draft EIR includes Impact 4.15-6, which evaluates potential impacts from increased demand for solid waste associated with “buildout of the net SAP area and PRSP area. Impact 4.15-6 concludes (page 4.15-57) that:

after the recycling and diversion requirements for construction waste in the net SAP area and PRSP area are met, a total of 192,695 cubic yards of construction waste would remain, which would be 0.8 percent of the remaining capacity at WRSL. Combined, operation of new uses in the net SAP and PRSP areas would generate 201 tons of solid waste on a daily basis, which would be 36 percent of the available daily permitted processing capacity at the MRF. Annually, buildout of the net SAP area and PRSP area would result in the disposal of an estimated 49,004 cubic yards, which would be 0.2 percent of the remaining capacity at WRSL. Because implementation of the SAP and PRSP would comply with all regulatory requirements that relate to the disposal and recycling of solid waste and because the MRF and WRSL have adequate capacity for disposal of solid waste generated by construction and operation of the SAP and PRSP, this impact would be less than significant.

The commenter provides no evidence that consumption of 0.8 percent of the remaining capacity at WRSL would substantially reduce the lifespan of the landfill. Furthermore, the Draft EIR evaluates

cumulative impacts related to the WRSL and MRF. See Cumulative Impact 4.15-17: Cumulative increase in demand for solid waste services (Draft EIR, page 4.15-69). No revisions to the Draft EIR are necessary.

- 4-77 The comment suggests that the Draft EIR should be revised to discuss the need for a wastewater metering facility, its location, and impacts. At the time of preparation of the Draft EIR, the need and location for wastewater metering facilities was not known and will not be known until further along in the design process. To include such information at this time would be speculative. The Placer Ranch Sewer System Master Plan (included as Appendix H of the Draft EIR) details the flow meter requirements. Page 37 of the Sewer System Master Plan states:

In order for the City to account for contributing flows to the treatment plant, flow meters shall be installed at the Placer County/City of Roseville boundary line where the sewer pipe crosses from County to City jurisdiction. There is currently an existing flow meter, known as the Cincinnati meter, located at the southern limit of Cincinnati Avenue. A proposed flow meter shall be located on the Fiddymont Road sewer main to measure flows from PRSP and the SA which are from the County. The City of Roseville will assist with locating the proposed flow meter, along the pipeline alignment.

- 4-78 The comment suggests that the Draft EIR should be revised to discuss the need for a recycled water metering facility, its location, and impacts. See response to comment 4-77. As described in Chapter 2, "Revisions to the Draft EIR," the May 2017 Placer Ranch Recycled Water Master Plan was included as Appendix G to the Draft EIR; however, a more recent July 2017 version of the document should have been included instead of the May version. The July 2017 Placer Ranch Recycled Water Master Plan, which is included as Appendix B of this Final EIR, states (p. 13) "[t]he transmission pipeline will be designed to fill the tank during either peak or off-peak hours through a [pressure release valve] and metering station located at the Roseville city limit. It should be noted that impacts associated with the metering station are consistent with the overall impacts evaluated for the utilities infrastructure and other development associated with the PRSP and this additional specificity does not change the impacts or conclusions of the Draft EIR.
- 4-79 The comment suggests that the two 12-inch water mains that would extend from the City of Roseville boundary and connect to proposed 42-inch and 24-inch water mains within the PRSP area be revised to be 24-inch lines. As outlined in the Placer Ranch Potable Water Master Plan, the location of the 12-inch water mains provides the appropriate system looping for reliability. The planned area's maximum day demand is approximately 3 mgd, which can be obtained via two 12-inch mains or a single 18-inch main. As designed, these lines can be extended into the City of Roseville to enhance water system reliability in this area of the City. In addition, a 42-inch regional-serving water line would also be extended into the City of Roseville via the Placer Parkway corridor, consistent with Placer County Water Agency's (PCWA's) master plan. The City of Roseville would have the opportunity to tie into this line from the 24-inch line planned in future Westbrook Boulevard, which provides a viable solution for the City of Roseville to enhance its water infrastructure reliability without requiring 24-inch water lines to be extended from the PRSP area as requested.
- 4-80 The comments requests that text be added to the recycled water discussion on page 4.15-8 of the Draft EIR. The Draft EIR is revised, but not page 4.15-8, as requested by the commenter. In response to this comment and to provide additional clarity, the second paragraph on page 3-26 of the Draft EIR is revised as follows:

SAP Potable and Recycled Water Systems

The *Sunset Area Water, Wastewater, and Recycled Water Technical Report* was prepared by Psomas in 2017 to evaluate the wet utilities infrastructure needed to serve buildout of the SAP area. (Note that separate master plans were prepared for the PRSP's potable and recycled water systems.) As indicated in this report (included as Appendix B), the Placer County Water Agency (PCWA) is the water wholesaler and retailer for customers within the

Sunset Area. The Sunset Area is located within PCWA's lower Zone 6 service area. Recycled water would be provided by PCWA as the retailer with the City of Roseville as the wholesaler providing recycled water from the Dry Creek Wastewater Treatment Plant and Pleasant Grove Wastewater Treatment Plant (PGWWTP). The City of Roseville provides recycled water to customers on a first-come, first-served basis. The City of Roseville would provide the County an opportunity to reserve recycled water supply prior to development under the SAP/PRSP, as considered in the December 2009 South Placer Regional Wastewater Systems Evaluation Final Report. Projected flows and anticipated pipeline diameters and locations are described in detail in the technical study included as Appendix B. Off-site pipeline extensions are identified in Exhibit 3-3 above. The recycled water system would require a reevaluation of the recycled water availability at the time of connection of individual developments. If improvements are needed, they would be funded by those developments.

- 4-81 The comment requests that text be added to the recycled water discussion on page 4.15-8 of the Draft EIR. The revised text is added to page 3-26 of the Draft EIR as shown in response to comment 4-80, above.
- 4-82 The comment states that the Draft EIR must explicitly state whether the demand for recycled water is within or exceeds the estimated peak day demand considered in the Systems Evaluation. Recycled water is evaluated in the Draft EIR as a component of Impact 4.15-1, which evaluates potential impacts related to water supply. The Placer Ranch Specific Plan Recycled Water Master Plan, included as Appendix G of the Draft EIR, provides additional detail regarding recycled water and states (page 17) that since recycled water is being supplied by the wholesaler during off-peak periods, existing City of Roseville peak hour recycled water demands should not be affected but that additional coordination with the City of Roseville as well as the execution of a recycled water operations agreement per the Amended and Restated Agreement Regarding the Operation and Use of the South Placer Regional Wastewater Facilities dated October 1, 2012, would be required. Additionally, on-site recycled water storage would be 120 percent of one max day of demands; therefore, it is expected that recycled water would be available from the wholesaler. It should also be noted that the Draft EIR (page 4.15-8) identifies the City of Lincoln as another option for providing recycled water.
- 4-83 The comment requests a minor clarification to the text in the first paragraph on page 4.15-9 of the Draft EIR regarding SPWA. Consistent with the requested text change, page 4.15-9 of the Draft EIR is revised as follows:

Wastewater collection facilities are in place to serve existing land uses in the SAP area and are provided through County Service Area (CSA) 28, Zone of Benefit 2A3. CSA Zones of Benefit have been developed in Placer County to own and operate utility systems and to assess customers of separate, specific areas based upon the costs of serving those areas. CSA 28, Zone of Benefit 2A3 was established to provide sewer services to the SAP area. The boundary of CSA 28, Zone of Benefit 2A3 includes all existing developed property in the net SAP area. As new development comes on line, it is required to annex to the CSA Zone of Benefit to connect to existing sewer collection facilities. SPWA partners (Placer County, SPMUD, 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. Funding for CSA services are provided through property assessments. New development also must pay local and regional connection fees. The local connection fee is collected by the CSA and regional fees are forwarded to the City of Roseville as the contribution by the CSA Zone of Benefit toward payment of the bond debt related to the construction of the regional wastewater facilities (Placer County 2017a:12).

- 4-84 The comment requests that the text on page 4.15-12 be revised to disclose that the SPWA service boundary would be adjusted to include the entire PRSP and net SAP areas. Page 4.15-12 of the Draft EIR is part of the "Environmental Setting" discussion, which describes the existing physical

conditions of the project site and surroundings. Adding text that does not relate to the existing physical conditions would not be appropriate in this part of the Draft EIR section. The Draft EIR includes Mitigation Measure 4.15-4a, which requires annexation to SPWA's regional service area and PGWWTP's service area. This addresses the concern raised in the comment; therefore, the Draft EIR requires no revision. However, in response to this comment, it should be noted that SAP Policy PFS-4.1 on pages 4.15-33 and 4.15-34 of the Draft EIR is revised as follows (these revisions apply to the SAP and to the Draft EIR):

- ▲ **Policy PFS-4.1: Wastewater Management.** The County shall coordinate with the Cities of Lincoln and Roseville to ensure efficient and effective management of wastewater. This includes ensuring that development projects proposed in the Sunset Area have access to sufficient capacity at either the Lincoln Wastewater Treatment and Reclamation Facility or the City of Roseville ~~Pleasant Grove~~ Wastewater Treatment Plants. For projects which exceed the planned wastewater and/or recycled water capacities outlined in the South Placer Wastewater Authority's South Placer Regional Wastewater and Recycled Water Systems Evaluation report, the County shall require project proponents to conduct additional wastewater and/or recycled water analysis and if supply is available projects will need to mitigate impacts identified in the analysis. Mitigation could include contribution to fund future infrastructure system improvements and expansion.

- 4-85 The comment suggests a minor clarification to the text on page 4.15-25 of the Draft EIR. Consistent with the requested text change, the second full paragraph on page 4.15-25 of the Draft EIR is revised as follows:

The SPWA is a joint powers authority formed to fund regional wastewater ~~and recycled water~~ facilities in southwestern Placer County for three partner agencies (the "participants"): City of Roseville, SPMUD, and Placer County. The regional facilities funded by the SPWA include trunk sewer lines and two wastewater treatment plants (WWTPs). All three participants transmit wastewater to these WWTPs. SPWA monitors compliance with funding and operational criteria established in the Funding and Operations Agreements among the participants.

- 4-86 The comment notes an inconsistency between peak wet weather flows (PWWF) identified on pages 4.15-43 and 4.15-45. The Draft EIR (page 4.15-43) reports two different PWWF estimates, but they are not inconsistent. The estimated 11.76 mgd PWWF is the total PWWF resulting from buildout of the net SAP area. The estimated 8.49 mgd PWWF is the amount of flow expected to be conveyed through the PRSP wastewater conveyance system (as opposed to other points of connection). See Table 5 in Draft EIR Appendix B, Sunset Area Water, Wastewater, and Recycled Water Technical Report.
- 4-87 The comment suggests that the upsizing of a 24-inch to 27-inch sewer line (discussed on page 4.15-46 of the Draft EIR) needs to be added as a mitigation measure. Chapter 3 of the Draft EIR, "Project Description," specifically identifies the potential need to upsize "one 24-inch sewer line to a 27-inch sewer line where two existing 24-inch lines cross under Pleasant Grove Creek" (Draft EIR, page 3-71). Therefore, no changes to the Draft EIR are necessary.
- 4-88 The comment suggests that the analysis of Impact 4.15-4 be revised to evaluate project flows in addition to buildout flows, not current flows, at the PGWWTP to ensure capacity. In addition to Impact 4.15-4, the Draft EIR includes Cumulative Impact 4.15-15, which evaluates the project's contribution to cumulative increase in demand for wastewater treatment services, including wastewater demand associated with cumulative development projects. See Table 4.15-14 of the Draft EIR, which summarizes the buildout average dry weather flows for the SPWA service boundaries. The Draft EIR requires no revision in response to this comment.

- 4-89 The comment notes a discrepancy between the flows for the PRSP and SAP areas indicated in Impact 4.15-4 of the Draft EIR and the flows shown on page 19 of Appendix H of the Draft EIR. Appendix H does not include the most recent calculations used in the Draft EIR analysis. The Draft EIR states (p. 4.15-1) several technical memoranda [included as Appendix P of the Draft EIR] were prepared to update the utilities calculations in response to the revised PRSP, including updates to the Potable Water, Recycled Water, and Water Conservation Master Plans; the Sanitary Sewer Master Plan; the Storm Drain Master Plan; and the Dry Utilities Master Plan. The revised calculations in these technical memoranda reflect the revised land use plan and are incorporated into this section of the Draft EIR. The calculations included in Appendix P of the Draft EIR are consistent with the calculations used in the Draft EIR analysis.
- 4-90 The comment notes a discrepancy between the ADWF for the SAP shown in Table 4.15-10 of the Draft EIR and the ADWF shown in Appendix H of the Draft EIR. This is the same issue identified in comment 4-89. See response to comment 4-89.
- 4-91 The comment requests changes to text in Appendix G of the Draft EIR to show that recycled water would be provided through the line in Woodcreek Oaks Boulevard, not the North Zone Pump Station. As the appendix is a technical document prepared for the project, it represents preliminary designs and plans that may change prior to construction. No revisions to the technical studies are necessary.
- 4-92 The comment requests a change in the text of Section 4.3 in Appendix G of the Draft EIR. As this appendix is a technical document prepared for the project, it represents preliminary designs and plans that may change prior to construction. No revisions to the technical studies are necessary.
- 4-93 The comment requests removal of reference to the North Zone Pump Station in Appendix H of the Draft EIR. As this appendix is a technical document prepared for the project, it represents preliminary designs and plans that may change prior to construction. No revisions to the technical studies are necessary.
- 4-94 The comment notes a discrepancy in the ADWF for the PRSP area between page 19 of Appendix H and page 3 of the SSMP. The two studies identified by the commenter were prepared for two different plans by two different technical experts. This difference, which is less than 0.2 mgd, between two different plans does not represent a substantial discrepancy. In addition, the estimated “2.17 mgd” identified by the commenter was further refined in the Draft EIR, which states (page 4.15-66), “the Systems Evaluation estimated flows from PRSP area development to be 2.17 mgd ADWF (RMC Water and Environment 2009:3-5 and 3-6). Development in the PRSP area is anticipated to generate an estimated 1.99 mgd ADWF, which is lower than the wastewater flows anticipated by the Systems Evaluation. Presumably, PWWF from PRSP area development would also be lower than assessed in the Systems Evaluation.” Therefore, this minor difference between a specific value as reported in two Draft EIR appendices does not affect the analysis of the Draft EIR because the Draft EIR refines the estimate, anyway. No revisions to the Draft EIR are necessary.



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**Letter
5**

Erik C. White, Air Pollution Control Officer

February 22, 2019

Ms. Shirlee Herrington
 Environmental Coordination Services
 Placer County Community Development Resource Agency
 3091 County Center Drive
 Auburn, CA 95603

Subject: Review of Draft Environmental Impact Report for the Sunset Area Plan - Placer Ranch Specific Plan

Dear Ms. Herrington:

The Placer County Air Pollution Control District (District) thanks you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) prepared for the proposed Sunset Area Plan (SAP) and Placer Ranch Specific Plan (PRSP) Project. The District has the following comments on the Project’s DEIR for your consideration. Our comments focus on two areas of which the District has expertise; air emissions and odor. First we have some recommendations relating to GHG and criteria pollutants. Then, we will address odor impacts.

1. Table 4.7-2 and Table 4.7-3 of the DEIR should be consistent with the modeling results shown in Appendix K. The following tables are from Appendix K summarizing the total unmitigated and mitigated operational Greenhouse Gas (GHG) emissions from the SAP Area and the PRSP Project at full buildout¹.

PRSP Operation - Unmitigated		SAP Operation - Unmitigated	
Source	Emissions	Source	Emissions
Area	7,797	Area	934
Energy	35,933	Energy	81,219
Mobile	147,988	Mobile	282,392
Waste	7,109	Waste	10,469
Water	2,177	Water	2,926
Total	201,004	Total	377,940

PRSP Operation - Mitigated		SAP Operation - Mitigated	
Source	Emissions	Source	Emissions
Area	5,185	Area	26
Energy	33,948	Energy	46,112
Mobile	147,988	Mobile	282,392
Waste	7,109	Waste	10,469
Water	1,760	Water	2,346
Total	195,990	Total	341,345

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¹ Appendix K “Air Quality and Greenhouse Gas Emissions Modeling Results” page 3.

Ms. Shirlee Herrington
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The total unmitigated GHG emissions from the SAP Area in Table 4.7-2 should be 377,940 MTCO₂e/year and total mitigated GHG emissions from the SAP and PRSP Areas in Table 4.7-3 should be 341,345 and 195,990 MTCO₂e/year, respectively. In addition, Mitigation Measure 4.7-2b proposes to pay an offset fee to compensate for the project’s GHG emissions in excess of 1,100 MTCO₂e/year. Therefore, the correct GHG emission offsets for the SAP and PRSP Project should be 340,245 (341,345 - 1,100 = 340,245) MTCO₂e/year and 194,890 (195,990 - 1,100 = 194,890) MTCO₂e/year, respectively. Furthermore, notwithstanding the comments below in Item 2, the offset fee should be re-calculated based on the same formula used in Mitigation Measure 4.3-3c for the ROG and NOx Off-site mitigation fee calculation².

The followings are suggested corrections for Mitigation Measure 4.7-2b:

The net SAP area would generate ~~373,896~~ 341,345 MTCO₂e/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~372,795~~ 340,245 MTCO₂e/year for a period of one year. Based on the current average rate of \$12 per metric ton of CO₂e, the estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal ~~\$5,120,190~~ \$4,082,940 (equivalent to ~~\$0.66~~ \$0.55 per square foot for nonresidential and ~~\$954~~ \$327 per residential unit).

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 cont.

PRSP would generate ~~195,014~~ 195,990 MTCO₂e/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~193,914~~ 194,890 MTCO₂e/year, or ~~27.14~~ 27.27 MTCO₂e/year for each residential unit in the PRSP area. The estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal ~~\$1,706,730~~ \$2,338,680 (equivalent to ~~\$955~~ \$327 per residential unit).

- Mitigation Measure 4.7-2b proposes the purchase of carbon offsets to mitigate the operational GHG emissions from the SAP and PRSP Areas. The measure also includes a mitigation fee calculation based on the current average rate of \$12 MTCO₂e. The rate used to calculate the mitigation fee could be underestimated -- according to the EIR’s statement “*At the time this EIR was written, the average rate ranges from \$8 to \$35 per metric ton of CO₂e.*” Since the buildout of the SAP and PRSP Project is expected to occur over 80 years or more, the collective mitigation fee paid by the project applicants could not sufficiently satisfy the required GHG emission reduction if the future rate would be more than \$12 per metric ton. For this reason, Mitigation Measure 4.7-2b shall identify the required GHG reduction (MTCO₂e) for each nonresidential and residential unit instead of a mitigation fee per unit and to require that the project applicant satisfy the emission reduction requirement at the time of recordation of each final map.

5-2

² Mitigation Measure 4.3-3c determines the off-site mitigation fee based on a total of 7,146 residential units proposed by the PRSP and a total of 7,289,000 square foot non-residential development and 320 residential units proposed by the SAP, DEIR page 4.3-39

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Mitigation Measure 4.7-2b should explicitly indicate that the project applicant can satisfy the measure by 1) purchasing sufficient local or California-only carbon credits through the accredited carbon credit registries, 2) investing in a local GHG reduction project/program which complies with the approved protocols from the CAPCOA GHG Rx program or CARB’s Cap-and-Trade Offset protocols, or 3) paying the calculated mitigation fee based on the carbon credit rate at the time of the recordation of the final map. If the mitigation fee is chosen, the District recommends that the fee should be calculated based on the required GHG reduction and the latest CARB Cap-and-Trade Program Auction Settlement Prices³ for GHG allowances at the time of the final map recordation.

5-2
cont.

Mitigation Measure 4.7-2b also requires that the GHG reduction achieved through an offset or through the purchase of carbon credits must meet several criteria. However, the measure does not establish the mechanism to identify and monitor how the purchased carbon credits satisfy the criteria and how the measure should be implemented by the project applicant. The District recommends that the measure include the identification of individuals or agencies responsible for monitoring and verifying when the mitigation measure is implemented.

- 3. Impact 4.10-2 states that the proposed project includes an amendment to the County General Plan Policy 4.G.11, which would reduce the buffer around the Western Regional Sanitary Landfill (WRSL) from 1 mile (5,280 feet) to 2,000 feet for residential development, or 1,000 feet with the approval of a specific plan, master plan, or development agreement. According to the review of the existing odor complaint data from residents beyond the current 1 mile buffer, the DEIR concludes that the proposed SAP and PRSP Project would have potentially significant impacts on the WRSL.

The DEIR’s Appendix J includes two odor studies from SCS Engineers: *Review of Odor Management at WRSL* (November 9, 2017) and *Evaluation of Incremental Odor Increase from WRSL* (September 27, 2018). The first study reviewed the existing odor complaint data with landfill odor control practices during that time frame, and confirmed that the proposed SAP and PRSP Project would result in additional odor complaints because of the project allowing development within the existing 1-mile buffer zone.

5-3

The second study conducted a further analysis on the incremental increase in odor emissions and odor impacts that would result from implementation of the SAP and PRSP Project. The report estimated that the incremental odor emissions from the buildout of the proposed SAP and PRSP Project would represent 16 percent of the odor emissions generated at WRSL in 2018 and 8 percent of the odor emissions generated at WRSL in 2058. Additionally, this SCS study also investigated the incremental odor impacts corresponding to the proposed SAP and

³ CARB Cap-and-Trade Program compliance instrument auction information <https://www.arb.ca.gov/cc/capandtrade/auction/auction.htm>

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PRSP Project. However the results were not explicitly discussed in the DEIR.

The study modeled future odor impacts based on odor emissions, receptor locations to the WRSL, and meteorological conditions taken in June. The results presented as the number of exceedances to a threshold, in dilutions to threshold (DT). The red box drawing on SCS’ table shows the locations within the 1-mile buffer zone and the associated number of odor exceedances of 5 DT, 8 DT, and 10 DT. According to the analysis, odor is frequently considered to be offensive when it exceeds 8 DT. The following table4 is from SCS’ second study showing modeled odor impacts in 2058 (the time of the WRSL’s expected closure) with or without the implementation of the SAP and PRSP Project.

Table 7. Future Odor Impacts

Location	Upscaled Impact in 2058			Upscaled Impact Minus Project			Increase in Exceedance from Project		
	10 DT	8 DT	5 DT	10 DT	8 DT	5 DT	10 DT	8 DT	5 DT
WRSL parking lot	434	566	1059	375	505	938	59	61	121
Closest regional commercial	73	102	178	59	93	164	14	9	14
Mid North boundary of future Sac State	14	40	113	9	28	96	5	12	17
Roundabout at entry to future Sac State	1	7	13	0	3	9	1	4	4
Closest medium density residential	1	1	9	0	1	7	1	0	2
Closest low density residential	0	1	7	0	0	6	0	1	1
William Hughes Park	0	0	5	0	0	4	0	0	1
Leopard Davis Park	0	0	5	0	0	3	0	0	2
Verrazona and Vignolia	0	0	5	0	0	4	0	0	1
Closest high density residential	0	1	4	0	0	4	0	1	0
Greywood Circle	0	0	4	0	0	3	0	0	1
Woodcreek Oaks Safeway	0	0	3	0	0	3	0	0	0
Rainbow Trout	0	0	2	0	0	2	0	0	0
Veterans Park	0	0	2	0	0	2	0	0	0
Settlers Ridge	0	0	2	0	0	2	0	0	0
Dugan Park	0	0	2	0	0	2	0	0	0
Amaruso	0	0	2	0	0	2	0	0	0
Fiddymont Farm Elementary	0	0	2	0	0	2	0	0	0
Mel Hamel Park	0	0	2	0	0	1	0	0	1

The red box on above table shows the locations of future development created by the SAP and PRSP Project, within 1-mile buffer zone. According to the number of exceedances under the “Upscaled Impact Minus Project” column, the total number of odor impacts exceeding 8 DT are 193, all which occur in the new SAP and PRSP Areas. The total number of exceedances

5-3
 cont.

4 Appendix J “Evaluation of Incremental Odor Increase from Western Regional Sanitary Landfill” page 31.

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for the rest of the locations located outside of the 1-mile buffer zone is 0. This analysis is based on the month of June, which is not a peak month for odor complaints – the majority of odor complaints come in the winter and spring months.

According to the increase from **0** to **193** odor impact exceedances in the month of June in 2058, the SCS study clearly indicate that reducing the 1-mile buffer zone around the WRS� would substantially increase odor impacts with the implementation of the SAP and PRSP Project by placing people in much closer proximity to the WRS� -- even without consideration of any additional project-generated odors and in a month with very low odor complaints based on the current odor complaint history.

Furthermore, it can be reasonably interpreted that the SAP and PRSP Project would be expected to result in a more significant increase in odor impacts during the peak winter and spring months, again because of the project’s proposal to reduce the 1-mile buffer zone to the WRS�.

The DEIR points to several studies regarding implementation of on-site odor controls at landfill sites within California to remediate odor complaints. However, the DEIR states that these measures will not be considered because they are beyond the jurisdiction of Placer County. The DEIR’s impact discussion acknowledges an increase in future odor complaints created by the SAP and PRSP Project due to land use incompatibility. It goes on to acknowledge that this will place pressure or legal actions on the Western Placer Waste Management Authority (WPWMA) to implement additional odor control and reduction measures at the WRS�. Accordingly, the DEIR proposes to place the burden of mitigating the odor complaints to the public, enforcement agencies (such as the District), WPWMA, and the courts, rather than the project components in order to mitigate the land use incompatibility created by the approval of the SAP and PRSP Project. The odor problem will be exacerbated by new residential development from the SAP and PRSP Project that are closer to the landfill site; development which previously would have been prohibited by the one-mile buffer zone required by the County’s General Plan Policy.

The DEIR states that one option for the WPWMA may be to increase the solid waste service fee for all service areas (those areas of Placer County west of the city limits of Colfax which includes passing the increased solid waste service fees to the public) to cover future expenditure requirements for odor control and mitigation at the WRS�. These expenditures may include implementing additional odor control measures, paying litigation costs, transporting solid waste to the other landfill sites, such as the Ostrom Road Landfill site located in Yuba County (which has a current public environmental document for a proposal to receive solid waste from the Bay Area), or relocating the WRS� facility to another area. These potential scenarios would likely have very significant economic impact on WRS�.

5-3
cont.

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operations, as well as the jurisdictions within Western Placer County, including the cities of Lincoln, Roseville, and Rocklin.

As the DEIR states, the WPWMA is working on its Waste Action Plan to address future WRSL operational needs. The plan will identify operational options and analyze the options based on a variety of factors, including economics and odor impacts. Placer County is a member of the WPWMA’s Board of Directors who oversees the operation of the WRSL. The District strongly recommends that the County, as the lead agency under CEQA and a WPWMA Board member, requires the project applicant to commit to working with the WPWMA to develop an odor mitigation plan as a mitigation measure. The potential plan shall identify additional effective and proactive on-site mitigation measures with necessary financial assistance, through the WPWMA Waste Action Plan process, to reduce undesirable odor impacts resulting from the proposed project’s land use conflicts. The following are some suggested actions to be included in the proposed plan as mitigation for reducing odor impacts:

5-3
 cont.

- Increase the capture efficiency of landfill gas through use of more vertical and horizontal wells and stronger blower fan and trace gas evaluation testing.
- Enhanced cover of landfill areas using tarps, thicker layers of cover, permeable membrane, “Enviro” cover, “Posishell” cover, “closure” turf, compacting soil, and/or “enhanced” material such as vegetation, compost, green waste.
- Improved leachate management.
- Improved compost management using state of the art aeration methods.

The District can work with the County and WPWMA to monitor implementation of the mitigation measures.

4. The DEIR Section 4.13 addresses the potential impacts of the project on public services, including fire protection and emergency services, law enforcement, school, parks and recreation facilities, and library services. The DEIR Impacts 4.3-6 and 4.10-2 all conclude that the proposed SAP and PRSP Project will result in significantly incremental increases of odor emissions and odor impacts to both the existing community as well as to the new development, and a corresponding increase in complaints that the District must investigate and resolve. Thus, this section should discuss the District’s role in providing public services and identify mitigation measures for our increased need for resources to deal with odor complaints -- such as direct funding support to offset the costs for these additional services if the proposed project is approved.

5-4

Although the District is not identified by the DEIR for public service analysis, the District is a

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public agency, as defined by California Health and Safety Code⁵. We are responsible for addressing public nuisance, including odors resulting from the discharge of air emissions from any source⁶. As we discuss in the previous comment, the buildout of the SAP and PRSP Project will result in significant incremental increases of odor emissions and odor complaints due to its land use incompatibility. Additional odor complaints received by the District will require resources for investigation, response, and resolution. The District may need to adopt and enforce additional odor control regulations to address the increased number of public complaints regarding odors from the WRSL.

Providing the public with these services, including responding to an increased number of public nuisance complaints over a broader area, odor enforcement activities, and potential litigation for violations, will place a significant financial burden on the District. Without funding support, these costs may be passed on as per capita fees to jurisdictions served by the District, through permit fees upon Placer County businesses, or as fees to be paid by WRSL that will be passed on to the public through increased solid waste service fees. The District is willing to work with the County to identify necessary resources to provide services in responding to an increased number of odor complaints resulting from the buildout of the SAP and PRSP Project.

5-4
 cont.

Thank you again for the opportunity to review and comment on the DEIR. If you have any questions, please feel free to contact me at 530-745-2325 or ychang@placer.ca.gov.

Sincerely,



Yushuo Chang
 Planning and Monitoring Section Manager
 Placer County Air Pollution Control District

Cc: Erik White, Air Pollution Control Officer
 Christiana Darlington, District Counsel
 Bruce Springsteen, Compliance and Enforcement Section Manager
 Ann Hobbs, Associate Planner

⁵ California Health and Safety Code §40000
⁶ California Health and safety Code §41700

Letter 5 | Placer County Air Pollution Control District
 Yushuo Chang, Planning and Monitoring Section Manager
 February 22, 2019

5-1 The comment correctly identifies a discrepancy between the modeling results presented in Appendix K of the Draft EIR and Tables 4.7-2 and 4.7-3 in Section 4.7 of the Draft EIR. In response to this comment, Table 4.7-2 on page 4.7-19 of the Draft EIR is revised as follows:

Table 4.7-2 Unmitigated Operational Greenhouse Gas Emissions for Net SAP Area and PRSP Area at Full Buildout

Emissions Activity	GHG Emissions (MTCO _{2e} /year)	
	Net SAP Area at Buildout	PRSP Area at Buildout
Hearths and landscape equipment	1,512 <u>934</u>	7,797
Electricity consumption	35,107	17,700
Natural gas combustion	46,112	18,233
Vehicle trips	282,392	147,988
Solid waste generation	10,469	7,109
Water consumption and wastewater generation	2,926	2,177
Total operational annual GHG emissions	378,518 <u>377,940</u>	201,004
PCAPCD De Minimis Level	1,100	1,100
PCAPCD Bright-Line Threshold	10,000	10,000

Notes: Totals may not add because of rounding.; GHG = greenhouse gas; MTCO_{2e} = metric tons of carbon dioxide equivalent; SAP = Sunset Area Plan; PRSP = Placer Ranch Specific Plan.
 Full buildout of the SAP area is expected to occur past 2050, the latest year for which mobile-source emission factors are provided by the EMFAC2014 model.
 Source: Modeling conducted by Ascent Environmental in 2018

In response to this comment, Table 4.7-3 on page 4.7-23 of the Draft EIR is revised as follows:

Table 4.7-3 Mitigated Operation-Related Greenhouse Gas Emissions

Emissions Activity	GHG Emissions (MTCO _{2e})	
	Net SAP Area	PRSP Area
Landscape equipment	934 <u>26</u>	5,185
Electricity Consumption	32,840 <u>26,555</u>	15,715
Natural gas combustion	44,914 <u>46,112</u>	17,257 <u>18,233</u>
Vehicle trips	282,392	147,988
Solid waste generation	10,469	7,109
Water consumption and wastewater generation	2,346	1,760
PCAPCD De Minimis Level	1,100 MTCO _{2e} /year	1,100 MTCO _{2e} /year
PCAPCD Bright-Line Threshold	10,000 MTCO _{2e} /year	10,000 MTCO _{2e} /year
Total operational annual GHG emissions	373,895 <u>367,900</u>	195,014 <u>195,990</u>

Notes: Totals may not add because of rounding; GHG = greenhouse gas; MTCO_{2e} = metric tons of carbon dioxide equivalent; SAP = Sunset Area Plan; PRSP = Placer Ranch Specific Plan.
 Source: Modeling conducted by Ascent Environmental in 2018

This discrepancy also carried into the language for Mitigation Measure 4.7-2b, as pointed out in the comment. The comment provides specific revisions to the mitigation measure text. Comment 5-2 also raises issues with this mitigation measure that require revision; therefore, revisions to Mitigation Measure 4.7-2b are provided in responses to comment 5-2 below.

- 5-2 The comment acknowledges the long-term buildout of the project and the potential for carbon offset prices to vary drastically over the 80-year period. Rather than provide anticipated cost of carbon offsets, the comment suggests that the amount of greenhouse gas (GHG) emissions that need to be offset is provided in Mitigation Measure 4.7-2b by residential and nonresidential unit rather than a price per unit. This comment also suggests that additional language be added to Mitigation Measure 4.7-2b to identify the entities responsible for monitoring and verifying the purchase of carbon offset credits. In response to the comment, the discrepancies in the amount of mitigated GHG emissions are addressed and Mitigation Measure 4.7-2b on pages 4.7-21 and 4.7-22 of the Draft EIR is revised as follows:

Mitigation Measure 4.7-2b: Purchase carbon offsets (Net SAP Area and PRSP Area)

The County will require project proponents of individual developments under the project to offset operational GHG emissions remaining after implementation of Mitigation Measure 4.7-2a. This mitigation measure is consistent with guidance recommended by PCAPCD and CARB (PCAPCD 2017:54, CARB 2017:152). This measure is also consistent with the State CEQA Guidelines, which recommend several options for mitigating GHG emissions. State CEQA Guidelines Section 15126.4(C)(3) states that measures to mitigate the significant effects of GHG emissions may include “off-site measures, including offsets that are not otherwise required...”

Project proponents shall implement an off-site GHG emissions reduction program or to pay GHG offset fees to compensate for the project’s emissions in excess of 1,100 MTCO_{2e} for a single year, or as determined feasible by the County and project proponent. The off-site program shall comply with approved protocols from California Air Pollution Control Officers Association’s (CAPCOA) GHG Rx program or CARB’s Cap & Trade Offset protocols. Alternatively, the project proponent can purchase local or California-only GHG mitigation credits through the CAPCOA GHG Rx program or ARB accredited offset project registry. At the time this EIR was written, the average rate ranges from \$8 to \$35 per metric ton of CO_{2e}.

The net SAP area would generate ~~373,896~~ 367,900 MTCO_{2e}/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~372,795~~ 366,800 MT CO_{2e} for a period of one year, or 49.13 MTCO_{2e}/year per thousand square feet of nonresidential development and 27.27 MTCO_{2e}/year for each residential unit in the net SAP area. Based on the current average rate of \$12 per metric ton of CO_{2e}, the estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal \$5,120,190 (equivalent to ~~\$0.66~~ per square foot for nonresidential and ~~\$954~~ per residential unit).

PRSP would generate ~~195,014~~ 195,990 MTCO_{2e}/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~193,914~~ 194,890 MTCO_{2e}, or ~~27.14~~ 27.27 MTCO_{2e}/year for each residential unit in the PRSP area. The estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal \$1,706,730 (equivalent to ~~\$955~~ per residential unit). Detailed calculations for the Off-Site Mitigation Fee Program can be found in Appendix K.

This condition shall be satisfied prior to the recordation of each Small Lot Final Map or building permit issuance when a small lot map is not required.

PCAPCD and CARB also recommend that lead agencies prioritize direct investments in GHG emission reductions near the project site to provide potential local air quality and economic co-benefits. For example, mPOWER is a local program in Placer County that provides financing to property owners for the installation of energy and water efficiency retrofits and renewable

~~energy systems. Investing in mPOWER is consistent with the County's General Plan Policy 2.G.5, as described above in Section 4.7.3, "Regulatory Setting."~~

Other examples of local direct investments include financing installation of regional electric vehicle-charging stations, paying for electrification of public school buses, and investing in local urban forests. However, it is critical that any such investments in actions to reduce GHG emissions are real and quantifiable, as determined by the County, PCAPCD, or a consultant selected by the County.

Where development of a local offset is not feasible, the County will allow project proponents to mitigate GHG emissions through the purchase of ~~local or California only~~ carbon credits issued through the CAPCOA GHG Rx program or CARB-accredited offset project registry. The purchase of carbon credits shall be prioritized in the following manner: offsite within the SVAB portion of Placer County, within Placer County, or within California.

The GHG reductions achieved through an offset or through the purchase of a carbon credit must meet the following criteria:

- ▲ **Real**—They represent reductions actually achieved (not based on maximum permit levels).
- ▲ **Additional/surplus**—They are not already planned or required by regulation or policy (i.e., not double counted).
- ▲ **Quantifiable**—They are readily accounted for through process information and other reliable data.
- ▲ **Enforceable**—They are acquired through legally binding commitments/agreements.
- ▲ **Validated**—They are verified through the accurate means by a reliable third party.
- ▲ **Permanent**—They will remain as GHG reductions in perpetuity.

The project applicant can satisfy the requirements of this measure by purchasing sufficient carbon credits through the accredited carbon credit registries, investing in a local GHG reduction project/program which complies with the approved protocol from the CAPCOA GHG Rx program or CARB's Cap-and-Trade offset protocols, or paying the calculated mitigation fee based on the carbon credit rate at the time of the recordation of the final map or approval of the first building permit when a small lot map is not required. Demonstration of compliance shall be provided to the Placer County Planning Division and carbon offset purchases should be verified by a third party. If the mitigation fee is chosen, the fee should be calculated based on the required GHG reduction and the latest CARB Cap-and-Trade Program Auction Settlement Prices for GHG allowances at the time of the final map recordation or building permit issues when a small lot map is not required.

~~Establishment of offsets or purchases of carbon credits to offset operational-generated GHG emissions should be made prior to recordation of each small lot final map, or approval of the first building permit when a small lot map is not required.~~

- 5-3 The comment raises issues with the Draft EIR's presentation of odor study results, the characterization of effects related to adjusting the landfill buffer, and application of mitigation measures. See Master Response 4: Odors regarding discussion of odor impacts in the Draft EIR.
- 5-4 The comment suggests that PCAPCD is a public service and should have been included in the Draft EIR's evaluation of impacts on public services. See Master Response 4: Odors regarding potential economic impacts on PCAPCD resulting from the proposed project.