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# PLACER COUNTY GENERAL PLAN UPDATE



## *Countywide General Plan* **FINAL ENVIRONMENTAL IMPACT REPORT**

### **VOLUME II** *Comments and Responses to Comments*

Prepared by:

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July 26, 1994

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**INTRODUCTION**

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## INTRODUCTION

According to Section 15132 of the *State CEQA Guidelines*, final EIRs must contain the following information:

- (a) The draft EIR or a revision of the draft.
- (b) Comments and recommendations received on the draft EIR either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies commenting on the draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the Lead Agency. (*Public Resources Code*)

This part (Volume II) of the *Final EIR* for the *Placer County Countywide General Plan* responds to items (b), (c), and (d), while Volume I, which is a comprehensive revision of the *Draft EIR*, addresses items (a) and (e). The following paragraphs describe the County's public review process for the *Draft EIR* and how the this *Final EIR* addresses the requirements of the *State CEQA Guidelines* for responding to comments received on the *Draft EIR*.

### DISTRIBUTION AND REVIEW OF THE DRAFT EIR

The *State CEQA Guidelines* requires that agencies preparing EIRs "provide adequate time for other public agencies and members of the public to review and comment on a draft EIR." (Section 15203) While the law does not generally define what constitutes "adequate time," it does specify that draft EIRs submitted to the State Clearinghouse of the Governor's Office of Planning and Research should be subjected to a review period of at least 45 days. Section 15025 of the *State CEQA Guidelines* requires that draft EIRs for four classes of projects be submitted to the Clearinghouse: (1) those for which a state agency is the Lead Agency; (2) those projects for which a state agency is a Responsible Agency, Trustee Agency, or otherwise has jurisdiction over the project; (3) projects of statewide, regional, or areawide significance; and (4) reports prepared pursuant to the requirements of the National Environmental Protection Act (NEPA). The *Guidelines* (Section 15206 (b)(1)) further defines local general plans as projects fitting into the third category above (i.e., projects of statewide, regional, or areawide significance).

In compliance with requirements described above, the County submitted copies of the *Draft EIR* on the *Countywide General Plan* to the State Clearinghouse on October 1, 1993, thus initiating the mandatory 45-day review period. At the same time, the County distributed copies of the *Draft EIR* to numerous local agencies, organizations, and individuals with an interest in the General Plan Update. The *State CEQA Guidelines* (Section 15203 (a)) requires that the local review period for a draft EIR be consistent with applicable Clearinghouse review periods, so the County established a local review period that coincided with the Clearinghouse's 45-day review period (i.e., October 1, 1993, through November 15, 1993).

The County received two types of comments on the *Draft EIR* during the 45-day review period: first, it received approximately 60 written communications and, second, it received oral comments concerning the *Draft EIR* from 12 persons at four public hearings conducted during the 45-day review period (October 14, 28, and 29, and November 11, 1993).

## ORGANIZATION OF THIS VOLUME OF THE FINAL EIR

This volume of the *Final EIR* is divided into two sections. The first is the Common Responses to Frequent DEIR Comments, which consists of a discussion of 11 recurrent themes in the comments received on the *Draft EIR*. This discussion is presented at the beginning of Volume II to minimize repetition in the individual responses and to highlight the major issues in the comments on the *Draft EIR*.

The second section of this volume contains the County's response to each comment on the *Draft EIR* it received. It includes a photocopy of each comment letter, with each individual comment marked with a unique identifier (A-2-3). Preceding each letter is a brief summary of each comment contained in the letter along with the County's formal response. In cases where the comment pertains to issues addressed in the Common Responses to Frequent EIR Comments, the County's response refers to one or more of the 11 responses in that section. Volume II also summarizes the oral comments made at public hearings concerning the *Draft EIR* along with the County's response to these comments.

The comment letters are organized in to nine section sections according to different classes of commentors, as follows:

- A. Placer County Cities
- B. School Districts
- C. Other Local Public/Quasi-Public Agencies
- D. State and Federal Agencies
- E. Environmental Organizations
- F. Property Owners and Developers
- G. General Public
- H. Community Organizations
- I. Oral Comments

Within each of these sections the comments are presented chronologically according to the order in which they were received.

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**SECTION I**

**COMMON RESPONSES TO FREQUENT DEIR COMMENTS**

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## SECTION I

### COMMON RESPONSES TO FREQUENT DEIR COMMENTS

#### 1. ALTERNATIVES ANALYSIS

Several commentors on the *Draft EIR* questioned the County's approach to satisfying CEQA's requirement for the analysis of project alternatives. According to the *State CEQA Guidelines*, an EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project, and evaluate the comparative merits of the alternatives." In the interest of satisfying CEQA requirements and following the directions set forth in the *General Plan Guidelines*, the Placer County General Plan Update Work Program included an "Issues and Options" phase, during which the County considered a series of policy and program options and several broad land use alternatives. The primary vehicle for this consideration was the *General Plan Issues and Options Report*, which was published in January 1993. The report was subjected to an extensive round of public review, including six townhall meetings at various locations throughout the county and seven public meetings before the Board of Supervisors. The purpose of the *Issues and Options Report* was to solicit policy direction, based on a comparative analysis of alternatives, from the Board of Supervisors on key issues to be addressed in the General Plan Update and to provide the framework for developing the goals, policies, implementation programs, and land use and circulation plans of the *General Plan Policy Document*. The Issues and Options process, in conjunction with the research for the *Draft General Plan Background Report* and other work undertaken as part of the General Plan Update (including a series of townhall meetings conducted in November 1991), actually served as an expanded scoping exercise, involving extensive early consultation with persons, organizations, and agencies concerned with the project via the numerous public meetings. This comports well with CEQA's descriptions of the *environmental planning process*, although it does not appear to satisfy the expectations of some who believe that the most appropriate time to consider alternatives is during the *environmental report writing process*.

The County stands by the approach to alternatives analysis used in the *DEIR*. The Issues and Options process provided a thorough opportunity to compare and assess the implications of not only a set of distinct land use alternatives, but also a variety of policy and program options. The process is particularly well-suited to the type of broad, long-range planning that is necessarily involved with the preparation of a general plan, as opposed to the narrower, shorter-term perspective associated with development project review. Furthermore, the public review of the *Draft General Plan* by the Planning Commission and Board of Supervisors provided a forum for consideration of an additional alternative, with the benefit of the full *Draft EIR*. The County believes that the General Plan Update Program, through the Issues and Options process and public review and discussion of the *Draft General Plan*, maximized opportunities for meaningful public discussion of alternatives.

While the County stands by its approach to alternatives analysis, it nonetheless concedes that the *Final EIR* should provide a clearer explanation of how the chosen approach to the CEQA-required alternatives analysis operates. Specifically, Chapter 10 of the *FEIR* contains an expanded discussion of the alternatives that the County considered during the General Plan Update process. This includes the addition of a comparative analysis of the alternatives considered during the process and an expanded description of how the process has addressed the *State CEQA Guidelines'* directions concerning alternatives analysis, including a more thorough discussion of how the Board of Supervisors defined the project (i.e. selected an alternative). Chapter 10 also more thoroughly explains why the Board rejected various alternatives considered during the Update process, including those that might have been environmentally superior to

the "project." Finally, Chapter 10 of the *Final EIR* includes a matrix comparing the significant impacts of the *General Plan* with those that might have occurred under the alternatives considered.

## 2. APPROACH TO MITIGATION MEASURES

As described in the *Draft EIR*, the *Draft General Plan* and *Draft EIR* were prepared simultaneously in an effort to incorporate environmental mitigations into the plan. As the two documents were prepared and analyzed, policies and programs were developed and included in the *Policy Document* to reduce environmental problems and to mitigate potentially adverse impacts. Several commentors questioned this "self-mitigation" approach. The County strongly believes that this is the most sensible and practical way to "plan environmentally." By folding its mitigation measures into the *Policy Document* as policy, the County makes its "mitigation measures" enforceable through implementation of the *General Plan*, which the California Supreme Court has called the "constitution" for development within a city or county. This commits the County, according to state law, to ensuring that all subsequent zoning decisions, specific plans, use permits, subdivision maps, development agreements, and other actions comply with the *General Plan* policies (mitigation measures), thus guaranteeing their enforcement.

The alternative to this "self-mitigating" approach would have been to prepare the *EIR* following preparation of the *Policy Document*, identifying mitigation measures to address the identified impacts within the *EIR*. These mitigation measures would then be referenced in the findings and mitigation monitoring program adopted in conjunction with certification of the *EIR*; this is the approach typically taken with project-level *EIRs*. The County's approach to preparing the *General Plan* accomplishes the same objectives, but with the added policy commitment described above. The County feels that the approach to mitigation measures that it has taken in the *EIR* affords those concerned with the best available information regarding the County's commitment to addressing the environmental impacts of development.

Some commentors also expressed concerns regarding how mitigating policies are linked to the impacts that they address. The *Final EIR* has improved the reader's ability to make such a connection by including the text of mitigating policies and programs, whereas the *Draft EIR* contained only references to policy and program numbers.

Finally, related to mitigation measures, several comments on the *DEIR* and the *Draft Policy Document* seemed to presume that the County would *not* implement the policies and programs of the *General Plan*, and thus would not mitigate potential environmental impacts resulting from development under the *Plan*. Upon adoption, the *General Plan* constitutes the County's official policy statements with respect to growth and development; failure of the County, including the Board of Supervisors, Planning Commission, and staff, to ensure that development projects and other County actions are consistent with the *General Plan*, therefore, constitutes a violation of state law, as well as adopted County policy.

## 3. TRAFFIC ANALYSIS

Several commentors, particularly the cities and Caltrans, expressed concerns that the traffic analysis in the *Draft EIR* did not adequately consider impacts on roadways that are not under County jurisdiction. Many of these same commentors also criticized the *DEIR* for not defining mitigation measures to address impacts on non-County roadways. In preparing the *Draft EIR*, the County decided that it would be inappropriate for the County to recommend measures to the cities and Caltrans to mitigate traffic impacts revealed by the County's *EIR* analysis. In the *Final EIR*, in response to such comments, the description of impacts

on roadways outside of the County's jurisdiction has been expanded and potential mitigations suggested, without prescribing definitive solutions.

On a related note, several of the critics of the *DEIR's* traffic analysis seem to have misunderstood both the nature of the traffic analysis and the approach to the preparation of the development estimates that underlie the analysis. In response, it should be noted that (1) the development scenarios in the *EIR* allocated assumed (fixed) population and employment levels at years 2010 and 2040 and (2) the development estimates do include development within incorporated cities and their spheres of influences, including development on land adjacent to cities that is designated for agricultural uses on the County's *Land Use Diagram*. In other words, the findings of the *EIR's* traffic analysis reflect impacts resulting from both unincorporated and incorporated development, as well as development elsewhere in the Sacramento region; much of the congestion forecasted in the County's traffic model, in fact, is the result of the high levels of development assumed within the cities.

Finally, some critics of the *Draft EIR* circulation analysis asserted the traffic modeling technique used is not sufficient to address the requirements of CEQA. They argue that the analysis should address impacts at an intersection, rather than roadway segment, level. The County disagrees with this assertion and stands by the basic approach used in the *EIR*.

#### 4. INFRASTRUCTURE ANALYSIS

One of the fundamental underpinnings of the *EIR's* infrastructure analysis is the presumption that, because *Policy Document* policies require new development to cover the cost of necessary infrastructure, the impacts on sewer, water, and drainage systems will be less-than-significant. In other words, the *Policy Document* will preclude development that cannot demonstrate that it can adequately address infrastructure needs. Many commentors either took issue with this presumption, or did not understand it; this relates to item 2 above.

While the County disagrees with the general criticism of the infrastructure analysis, it does acknowledge several items needed to be made clearer in the *Final EIR* than they were in the *Draft EIR*. Accordingly, the analysis was edited to more closely resemble the other *FEIR* analyses, and the emphasis of the analysis was modified to focus more specifically on impacts resulting from development in 2010, with a de-emphasis on development in 2040 and at buildout.

Finally, the County would like to point out that the CEQA does not require the detailed infrastructure analysis requested by several critics of the *Draft EIR*.

#### 5. FISCAL/FINANCIAL ANALYSIS

Several commentors requested that the *DEIR* include analysis of the fiscal and financial implications of development under the *Draft General Plan*. The County's Economic Consultants (Recht Hausrath & Associates) did prepare a separate memorandum addressing fiscal issues, which was not incorporated into the *Draft EIR*; this memo was, however, provided to the Planning Commission and the Board of Supervisors and distributed to the public.

A final, and critical, point related to this comment is that CEQA does not require that EIRs assess fiscal and financial "impacts," despite the usefulness of such information in helping local officials make land use decisions. Placer County understands well the utility of fiscal and financial analysis, as demonstrated by the substantial expenditures it has made to establish an ongoing framework for such analysis.

## 6. IMPACTS ON WESTERN REGIONAL SANITARY LANDFILL

The Western Placer Waste Management Authority (WPWMA), among others, took issue with the *DEIR*'s failure to address the potential effects of locating development near the Western Regional Sanitary Landfill. The County feels that the buffer standards and policies adequately address these concerns. Furthermore, WPWMA's concerns have since been addressed by the Board of Supervisors' decision to remove the Stanford Ranch West Specific Plan Area designation from the *Land Use Diagram*.

## 7. SCHOOLS ANALYSIS

The Placer County Office of Education, along with several Placer County school districts and other commentors, requested that the County supplement the *DEIR* with an analysis of school impacts. The Office of Education also provided an analysis of these impacts, which has been used as the basis for the discussion of school impacts added to the *Final EIR*. While the County agreed to add the discussion of school impacts, it did so with the understanding that these impacts would not be considered as "CEQA" impacts and that the *FEIR* would not recommend mitigation measures on behalf of the school districts.

Perhaps the most important school-related action the County took as a result of the public review of the *Draft General Plan* and *Draft EIR* was the addition of Policy 4.J.13, which states that "before a residential development, which includes a proposed general plan amendment, rezoning or other legislative review can be approved by the Planning Commission or Board of Supervisors, it shall be demonstrated to the satisfaction of the hearing body that adequate school facilities shall be provided when the need is generated by the proposed development." This addition was a direct response to requests from the Placer County Office of Education and several local school districts.

## 8. MITIGATION MONITORING

The *Draft EIR* explained that CEQA's requirement for monitoring of mitigation measures would be satisfied through the ongoing implementation and review of the *General Plan*, specifically through Implementation Program 10.1 of the *Policy Document*. Some commentors suggested that this approach does not adequately address CEQA's requirement. The County disagrees; the approach to mitigation monitoring described in the *DEIR* and *FEIR* is both practical and legally adequate. According to that approach, those policies and programs that are essential to either maintaining less-than-significant impacts below the level of significance or minimizing the effects of impacts judged to be significant have been listed in findings prepared for the adoption of the *General Plan* and certification of the *Final EIR*. This list will be used in the annual review of the *Policy Document* to evaluate the County's application of mitigating policies and implementation of mitigating programs.

## 9. ANALYSIS OF WATER SUPPLY AVAILABILITY

Several commentors question the *DEIR*'s assertions that water supply impacts will be less-than-significant in spite of statements that in some cases surface water rights may be insufficient to serve both domestic and agricultural irrigation demand in 2040. The County acknowledges that the *DEIR* was confusing in this respect, so the *Final EIR*'s analysis has been recast. The County would like to further point out that the primary focus of the *DEIR*'s analysis is the year 2010 and that conclusions of significance are stated for that year, not for 2040. The infrastructure section of the *Final EIR*, and the *FEIR* generally, makes this point more clearly than did the *Draft EIR*.

## 10. SUBSEQUENT PROJECT-LEVEL ENVIRONMENTAL REVIEW

Some commentors on the *Draft EIR* appeared to assume that no project-level environmental analysis will be conducted following adoption of the *General Plan*. This is not the case. State law mandates such environmental review, and the *Policy Document* emphasizes this requirement by explicitly stating that all new major development projects will be subjected to full environmental review under CEQA.

## 11. DRAFT GENERAL PLAN NEW GROWTH AREAS

Much of the public commentary the County received on the *Draft General Plan* and *Draft EIR* focused on the four "new growth areas" designated on the *Draft Land Use Diagram*. The most frequent comment regarding the new growth areas questioned whether they were necessary, given the amount of land designated already for development in Placer County. Throughout the General Plan Update process, the County has conceded that the amount of land designated or zoned for development in Placer County, both within and outside of cities, is sufficient to accommodate forecasted population and employment growth well beyond the year 2010. In providing direction on the *Draft Land Use Diagram*, however, a majority of the members of the Board of Supervisors concluded that areas not currently designated for development might be more appropriate than those areas currently designated, including areas within the spheres of influence of the cities. Part of the Board's rationale in providing this direction was to allow for a broader range of locational choices for accommodating demand for new development. In doing so, the Board members recognized that locations in unincorporated areas would be competing with locations in cities for the same increment of growth.

As a result of public review of the *Draft General Plan* and *Draft EIR*, the Board of Supervisors deleted all references to the new growth areas from the *Policy Document* and removed the Specific Plan Area (SP) designations for these new growth areas from the *Land Use Diagram*. These changes are reflected in the elimination of the Stanford Ranch West and Placer Villages new growth areas and the reversion of these areas to the designations that appeared on the previous general plan land use map (a mix of industrial and agricultural designations for Stanford Ranch West and agricultural designations for Placer Villages). In addition, the Bickford Ranch new growth area was eliminated, but designated Rural Residential, and the Villages of Dry Creek new growth area was included as part of the *Dry Creek/West Placer Community Plan* (and accordingly removed from the *Countywide General Plan Land Use Diagram*).

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**SECTION II**

**INDIVIDUAL COMMENTS AND RESPONSES**

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**A. Placer County Cities**

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**A-1 City of Roseville, Mayor's Office (10/5/93)**

A-1-1. Short review and compressed process

*The 45-day review period for the Draft EIR provided by the County complies with the requirements of State law. The Board of Supervisors and Planning Commission extended by several months the public comment period on the Draft General Plan. The description of the General Plan preparation process in Chapter 1 of the FEIR describes the Board and Commission hearings.*



# CITY OF ROSEVILLE

TRADITION • PRIDE • PROGRESS

311 VERNON STREET • ROSEVILLE, CALIFORNIA 95678 • PHONE (516) 781-0200

PLACER COUNTY  
DATE

OCT 15 1993

PLANNING DEPARTMENT

OCT 8 1993

October 5, 1993

- DATE 10-8-93
- Board of Supervisors - 5
- John Moran
- Don Lundford
- Clerk of the Board
- Pennington

Placer County Board of Supervisors  
175 Fulweiler Avenue  
Auburn, CA 95603

BOARD OF SUPERVISORS

Honorable Members of the Board:

**SUBJECT: Review Schedule for the Placer County General Plan Update and Draft Environmental Impact Report**

By this letter, we are objecting to the extremely short review time and the compressed public hearing process for the County's General Plan Update and Draft EIR. Between the date that these documents were received (late October 1, 1993) and the first scheduled public hearing, there are only seven full working days to complete and coordinate the City's review. This schedule is in strong contrast with the review process that the City conducted in the 1992 Roseville General Plan update. The draft Plan was distributed for public review seventy (70) days and the Draft EIR was made available thirty (30) days before the first Planning Commission meeting. Given the long term importance of the City's Plan, we feel strongly that any shorter review period would not have been in the best interests of the citizens of Roseville. Similarly, the County General Plan update and Draft EIR are of vital importance to the County's future. The County's extremely shortened review schedule is unrealistic and a disservice to the citizens of Placer County.

A-1-1

In closing, the City cannot overstate the importance of providing adequate time for the Placer County community including its cities to review and comment on these planning documents. In order to adequately address the potentially long term effects of the proposed Plan, we are requesting that the County revise the schedule and provide for a more reasonable time frame.

Sincerely,

*Bill Santucci*  
Bill Santucci  
Mayor

cc: City Council  
City of Rocklin  
City of Lincoln  
City of Loomis

RECEIVED

OCT 13 1993

CLERK OF THE BOARD OF SUPERVISORS

PLANNING DEPARTMENT

*Placer County General Plan Update*

**A-2 City of Rocklin (10/13/93)**

A-2-1. Objection to abbreviated review

*The 45-day review period for the Draft EIR provided by the County complies with the requirements of State law. The Board of Supervisors and Planning Commission extended by several months the public comment period on the Draft General Plan. The description of the General Plan preparation process in Chapter 1 of the FEIR describes the Board and Commission hearings.*



# City of Rocklin

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FAX 632-4013

PLACER COUNTY  
DATE RECEIVED

October 13, 1993

OCT 14 1993

Placer County Board of Supervisors  
and Placer County Planning Commission  
175 Fulweiler Avenue  
Auburn, California 95603

PLANNING DEPARTMENT

Subject: Schedule for Processing General Plan Amendment and Draft EIR

Members in Session:

This letter is to express our strong objection to the abbreviated process being followed by Placer County in the required public review of its General Plan Amendment and related EIR. The process gives the impression of being driven by an artificial deadline, rather than by sound planning principles.

The County General Plan Amendment has a potential of significantly impacting the City of Rocklin, particularly with respect to traffic, land use compatibility, public services, air quality and growth inducement. The City, therefore, intends to review the proposal carefully, and submit detailed comments.

A-2-1

The City's ability to analyze the project is affected in large part by the amount of information it has to review on the project. It cannot thoroughly analyze the project or understand its impacts on the City without the environmental information.

The City received the draft EIR on October 1, 1993. CEQA mandates a minimum 45 day review period to review the draft EIR and submit comments. Thereafter, responses to comments are prepared and published in the final EIR. This document, taken as a whole, contains vital information on the project which is necessary to the final review of the project and the City's understanding of how the project will impact the City.

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City Hall  
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Community Development  
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Community Services  
& Facilities  
632-4100

Engineering Department  
632-4040  
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Fire Department  
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Public Works Department  
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Police Department  
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Letter to Placer County Board of Supervisors  
and Placer County Planning Commission  
October 13, 1993  
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It is our understanding that the County intends to begin Planning Commission and Board of Supervisor hearings on the project well before the time that the draft and final EIRs are completed. In fact, the first Planning Commission hearing is scheduled for October 14, 1993, only seven working days after receipt of the draft EIR. While the City intends to participate in these hearings fully, its ability to participate meaningfully, raise issues, offer objections and propose modifications, is significantly restricted by the lack of information available on the project at this time. The draft EIR contains approximately 350 pages. The City staff has only begun to review this document. By scheduling and conducting Planning Commission and Board of Supervisor hearings prior to the completion of the forty-five day environmental review process prevents the City from participating in that process to the extent it desires and to which it is legally entitled.

A-2-1

We feel that conducting the hearings on the project prior to the completion of the environmental review process violates both the letter and the spirit of the law. We ask that you revise the schedule to give not only the City of Rocklin, but other affected jurisdictions, firms, and individuals the opportunity for meaningful participation in this important process.

Sincerely,



Carlos A. Urrutia  
City Manager  
City of Rocklin

CAU:bei

cc: Placer County Planning Department  
City of Roseville  
City of Lincoln  
Don Lunsford

cau/county

**A-3 City of Roseville Planning Department (10/14/93)**

A-3-1. New growth areas not needed to meet demand projections

*Refer to Common Response #11.*

A-3-2. Impacts on Roseville streets

*Refer to common response #3 and Chapter 4 of the Final EIR.*

A-3-3. Impacts on Roseville facilities and services

*Since CEQA requires no such analysis, the EIR does not assess the fiscal impacts of development under the General Plan, either on unincorporated areas or incorporated areas. The County's fiscal/economic consultant, Recht Hausrath & Associates, has, however, prepared a memorandum summarizing the findings of a fiscal analysis prepared in conjunction with the preparation of the Draft EIR. This memo is available for review and can be obtained through the Planning Department. In partial response to the commentors request, the memo does mention that cities have the latitude to institute user fees and service charges on non-residents to offset costs incurred as a result of use of city facilities and services by these non-residents. The memo also points out that historically the majority of purchases by residents of the unincorporated areas of Placer County has occurred in the cities; these purchases result directly in sales tax subvention revenues that support the provision of facilities and services within the cities, thereby offsetting costs that may result from the use of these facilities and services by unincorporated area residents.*

A-3-4. New growth areas will result in sprawl; no assurance that buffers will work

*See common response #11.*

A-3-5. Roseville supports directing new growth to cities

*See common response #11.*

A-3-6. County has not responded to earlier *Background Report* comments

*The Draft Background Report had not been revised between the time it was published in draft form on September 25, 1992, and the date of the comment. The Background Report has since been revised for adoption as part of the General Plan and for certification as part of the Final EIR. These revisions are based on all comments received since its publication of the Background Report in draft form.*

A-3-7. *General Plan* format is confusing and difficult to review and *Background Report* is outdated and inaccurate.

*The Draft Background Report was widely distributed in 1992. Virtually all public agencies that received the Draft EIR earlier received the Draft Background Report for review. The cover letter for the Draft EIR and Draft Policy Document noted the Draft Background Report's availability. See also the response to comment A-3-6.*

- A-3-8. *Issues and Options Report* cannot provide basis for policies because its not incorporated by reference.

*While the Issues and Options Report is not formally part of the General Plan, the directions from the Board of Supervisors on the subjects addressed in it provided the policy framework for the General Plan Policy Document.*

- A-3-9. Because inaccuracies in *Background Report* and *Issues and Options Report* are uncorrected, Policy Document is erroneous

*Commentor provides no specifics in support of this assertion. No response required.*

- A-3-10. Elements of General Plan are inconsistent because Circulation Diagram does not address Roseville streets

*The circulation element is correlated with the land use element as required by Government Code Section 65302(b). The General Plan achieves this correlation through traffic model analysis, level of service policies in the Draft General Plan Policy Document, and specification of needed circulation improvements.*

- A-3-11. Plan is internally inconsistent because it calls for long-term industrial uses in Sunset Area

*This comment concerns potential conflicts with the Stanford Ranch West Specific Plan, which appeared on the Draft Land Use Diagram, but no longer appears on the Land Use Diagram, no response is necessary. See also Common Response #11.*

- A-3-12. No consistency between agricultural preservation policies and designated new growth areas

*The General Plan focuses on preserving agricultural areas as designated on the Land Use Diagram. The Land Use Diagram represents Placer County's local legislative statement regarding the appropriateness of agricultural development relative to other types of development; this statement does not necessarily rely on an evaluation of soil types or agricultural land classification. The two new growth areas that would have converted the greatest amount of agriculturally-used land have been removed from the Land Use Diagram and agricultural buffers have been retained to address the interface between suburban and rural residential development and agriculturally-designated areas.*

- A-3-13. Urban separator buffer standards are inadequate

*The urban separator buffers have been removed from the Policy Document because the new growth area designations that would have required the application of the buffer no longer appear on the Land Use Diagram.*

- A-3-14. No implementation measures have been identified for majority of policies

*Commentor provides no specifics in support of the claim in the first sentence. There is no requirement in State law that implementation measures in a general plan be directly linked to specific policies or that one or more implementation measures be specified for each policy.*

A-3-15. Because of internal inconsistencies, plan fails to address City's concerns regarding land supply, impacts on city, and preclusion of sprawl

*Comment noted. No response necessary.*

A-3-16. Text and diagram are inconsistent because diagram does not show buffers, so their feasibility cannot be demonstrated

*There is no requirement that buffers be shown on the Land Use Diagram.*

A-3-17. Ag preservation policies are inconsistent with new growth area designations

*The General Plan focuses on preserving agriculturally-designated areas. See response to comment A-3-12.*

A-3-18. Plan policies do not mitigate potential traffic problems

*This comment concerns the Stanford Ranch West and Placer Villages new growth areas, which have been removed from the Land Use Diagram (see common response #11).*

A-3-19. Draft EIR does not identify mitigation measures

*See common response #2.*

A-3-20. Draft EIR alternatives analysis are grossly deficient

*The essence of this comment is addressed by common response #1. The County would like to point out that the State CEQA Guidelines allows agencies considerable flexibility in preparing EIRs for general plans.*

A-3-21. NOP Comment: New growth areas will significantly impact Roseville

*Comment noted. No response necessary.*

A-3-22. NOP Comment: County has adequately designated land to accommodate growth

*See response to comment A-3-1.*

A-3-23. NOP Comment: Draft EIR should consider fiscal impact of unincorporated development on City of Roseville

*See response to comment A-3-3.*

A-3-24. NOP Comment: Development in incorporated areas will result in more logical and environmentally growth sensitive pattern

*This comment implies that the cities of Placer County are necessarily more suitable sponsors of urban and suburban development and better custodians of the natural environment than is the County. The County disagrees with this contention. Furthermore, the County would submit that land within city spheres of*

*influence is not inherently more suitable for development or less environmentally sensitive than land in the unincorporated area of the county.*

A-3-25. NOP Comment: Draft plan can and should include provisions regarding jobs-housing balance

*The EIR includes no analysis of the jobs-housing balance, per se. While the consideration of the relationship between residential development and employment-supporting development is helpful in reviewing the implementation of long-range plans, and the Policy Document calls for such consideration, a jobs-housing imbalance is not in itself a significant adverse impact. The traffic congestion resulting from an imbalance could, however, be an adverse impact; partly in recognition of this possibility, the EIR includes a very detailed traffic impact analysis based on a travel demand model that, among other things, considers the relationships among different types of development (e.g., jobs-housing balance, commute patterns).*

*The County's Housing Element, which was adopted in June 1992, and various sections of the Draft Policy Document include policy and program commitments to ensure that new development in Placer County addresses the housing needs of all income groups likely to reside in Placer County.*

A-3-26. NOP Comment: Draft EIR should address growth-inducing impacts of County plan on Roseville

*The new growth areas designated on the Draft Land Use Diagram, to which this comment evidently refers, no longer appear on the Land Use Diagram.*

A-3-27. NOP Comment: Draft EIR should address impacts of residential development in Sunset Industrial Area near landfill

*The Stanford Ranch West Specific Plan area, to which this comment evidently refers, no longer appears on the Land Use Diagram.*

A-3-28. NOP Comment: Plan should provide for adequate buffers between Roseville and new growth areas

*Neither the new growth areas nor the urban buffer standards to which this comment refers any longer appear in the General Plan.*

A-3-29. NOP Comment: Draft EIR should address cumulative impacts on Roseville's roadways.

*The travel demand model used for the EIR analysis takes into account traffic on Roseville's roads, including traffic originating from development within the city of Roseville and from development in the unincorporated area. Because roadway improvements within Roseville's city limits are outside of the County's jurisdiction, however, the EIR does not recommend mitigation measures to address the need for such improvements.*

A-3-30. NOP Comment: Draft EIR should address flood impacts in Roseville

*The EIR references Policy Document policies and programs designed to address all flooding and drainage impacts associated with development under the General Plan.*

A-3-31. NOP Comment: *Draft EIR* should identify mechanism for providing sewer supply

*The Policy Document stipulates, and the EIR assumes, that new development will be required to provide for all infrastructure necessitated by the development.*

A-3-32. NOP Comment: *Draft EIR* should address water supply to new growth areas

*The Policy Document specifies that future urban development should rely on surface supplies for potable water and that the cost of developing these supplies will be borne by the development proponents. Refer also to common response #11.*

A-3-33. NOP Comment: *Draft EIR* should address *Draft Plan's* impacts on services and facilities provided by City of Roseville

*The Policy Document stipulates, and the EIR assumes, that new development will be required to provide for all infrastructure necessitated by the development. At the time that such development is proposed, the County will require that the providers of any services are consulted regarding the potential effects of the development; this would include the City of Roseville, if the development is assumed to rely on the City for any services and facilities.*

A-3-34. NOP Comment: Draft plan should address regional bikeway system

*The Draft Policy Document includes several policies and an implementation program addressing the development of an interconnected system of hiking, riding, and bicycling trails and paths.*

A-3-35. NOP Comment: Draft plan should address urban runoff in Roseville

*The Draft Policy Document includes policies and programs addressing drainage issues generally, and urban runoff specifically.*

A-3-36. NOP Comment: *Draft EIR* should address farmland conversion

*The EIR addresses the effects of farmland conversion.*

A-3-37. NOP Comment: *Draft EIR* should state project objectives clearly

*Project objectives are summarized in Chapter 1 of the EIR.*

A-3-38. NOP Comment: Rationale for project alternatives should be clearly described

*Refer to common response #1.*

A-3-39. NOP Comment: Analysis of cumulative impacts should consider development applications on file in cities

*In preparing the development estimates used as the foundation for much of the analysis in the EIR, the County's consultants considered the most recent estimates of development capacity available from all of the local agencies within and immediately adjacent to Placer County. These estimates in many cases reflected an aggregation of project proposals as described by representatives of the local agencies,*

including recognition of a considerable amount of speculative development projects within the sphere of influence of the City of Roseville. The County would like to point out that this is a general plan EIR and, for cumulative impact analysis, it would have been appropriate to simply look at the adopted general plans of other local agencies, but in the interest of providing as useful an analysis as possible, the County's consultants chose to evaluate information not heretofore analyzed.

A-3-40. NOP Comment: *Draft EIR* should not rely on future studies to determine project impacts

*Contrary to the commentor's assertion, recent case law (Al Larson Boat Shop, Inc. v. Board of Harbor Commissioners (1993) 18 Cal. App. 4th 729) indicates that it is entirely appropriate for EIRs on general planning programs to defer specific impact analysis to subsequent environmental analyses. Furthermore, the General Plan (not the EIR) appropriately stipulates that major development entitlements will not be granted without significant additional planning and environmental review.*

A-3-41. Miscellaneous comments on Draft Background Report

*The County has reviewed and extensively revised the Draft Background Report. This review and revision considered all comments submitted since publication of the draft report.*

A-3-42. *Draft EIR* should address full buildout of land use diagram

*The County disagrees with the commentors interpretation of CEQA's requirements. CEQA does not require EIRs to speculate about all possible effects, however far into the future. The EIR primarily assesses impacts in the year 2010 and secondarily in 2040. It is likely that full buildout of the designations on the Land Use Diagram will not occur until well beyond 2040. outcomes, and an analysis of full buildout of all land in the county designated for development would clearly be speculative.*

A-3-43. *Draft EIR* does not explain why viable project alternatives were eliminated from consideration

*Refer to common response #1.*

A-3-44. *Draft EIR* does not adequately describe feasible alternatives or feasible mitigation measures

*Refer to common responses #1 and #2.*

A-3-45. Alternatives analysis does not address specific resource issues discussed in *Draft EIR*

*The County acknowledges that the topical discussions of the Issues and Options Report differ from those of the EIR. The County does not, however, believe that the differences detracted from the intended utility of the Issues and Options Report, which was to provide the Board of Supervisors with information necessary to choose among alternative courses of action. Also refer to common response #1.*

A-3-46. Unless policies and programs are part of project description, *Draft EIR* must address impacts through mitigation measures

*The policies and programs of the Policy Document are definitely part of the project description. The commentor is correct in observing that development projects that are not able to demonstrate that they can comply with General Plan policies will not be able to proceed, and in many cases the feasibility of*

*any given project's compliance with General Plan policies will be determined via subsequent specific planning and environmental analysis.*

A-3-47. *Draft EIR does not include mitigation monitoring plan, as required by County Environmental Review Ordinance*

*Refer to common response #8.*

A-3-48. *Draft EIR does not specifically address short-term and long-term impacts of the project*

*Chapter 10 of the Final EIR includes a discussion of this issue.*

A-3-49. *Draft EIR does not include list of projects for the cumulative analysis*

*The State CEQA Guidelines specifically states that a cumulative analysis can rely either on a project list or on a summary of projections. Chapter 2 of the EIR summarizes the development estimates that satisfy this requirement. Refer also to the response to comment A-3-39.*

A-3-50. *Draft EIR should discuss significance of cumulative impacts*

*Chapter 10 of the Final EIR describes the EIR's approach to cumulative impact analysis.*

A-3-51. *Draft EIR does not address cumulative impacts for all resources discussed*

*Refer to the responses to comments A-3-39 and A-3-50.*

A-3-52. *Draft EIR does not address growth in a sufficient level of detail*

*Commentor provides no specifics in support of this assertion.*

A-3-53. *Draft EIR should address impacts of "leap frog" development*

*The County believes that the EIR sufficiently addresses the issues that might be associated with "leap frog" development. Furthermore, the new growth areas to which the commentor apparently refers have been removed from the Land Use Diagram (see common response #11).*

A-3-54. *Draft EIR should address premature conversion of agricultural land*

*Refer to the response to comment A-3-12.*

A-3-55. *Draft EIR's 2010 employment scenario is optimistic*

*The development estimates that underlie the EIR's analysis are derived from estimates prepared by the State of California Department of Finance (DOF). These DOF estimates, which consider regional, as well as local, growth trends are generally recognized as the most thorough and reliable estimates available. Furthermore, the estimates are consistent with similar estimates prepared by the Sacramento Area Council of Governments (SACOG).*

A-3-56. *Draft EIR* project description does not provide sufficient description of new growth areas

*See common response #11.*

A-3-57. New growth areas are inconsistent with project objectives

*See common response #11.*

A-3-58. *Draft EIR* does not adequately explain how new industrial development will minimize its impacts on adjoining development

*The policy references in the Final EIR cite standards and policies for buffering incompatible types of development from one another. The Final EIR also contains the full text of referenced policies*

A-3-59. *Draft EIR* does not describe potential land use conflicts in the Sunset Industrial/Stanford Ranch West area

*The Stanford Ranch West new growth area no longer appears on the Land Use Diagram.*

A-3-60. *Draft EIR* land use impact analysis is too limited

*The Final EIR's land use impact section has been reorganized to more clearly describe the potential effects of development under the Land Use Diagram.*

A-3-61. *Draft EIR* should conclude that alteration of existing or planned land use is a significant and unavoidable impact

*The Final EIR concludes that the impact of changes to existing land use is significant.*

A-3-62. *Draft EIR* should clarify whether term "open space" represents "traditional sense of the phrase"

*The Policy Document now includes illustrative examples of the types of open space that will satisfy the County's standard for passive recreation areas. The County does not understand the commentor's reference to "open space in the traditional sense of the phrase," since there is no universally-accepted "tradition" regarding what constitutes open space.*

A-3-63. *Draft EIR* should include clear analysis of adequacy of buffer zones

*The County feels that the buffers described in the Draft Policy Document generally address the items listed by the commentor. The potential incompatibilities associated with new development cannot specifically be identified until more definitive project applications are submitted to the County. At that point, the County will work with project proponents to define how to best implement the buffer standards.*

A-3-64. How did *Draft EIR* conclude that jobs and housing would move closer to balancing?

*The Draft EIR stated that did not conclude that jobs and housing "would" move closer to balancing; it instead indicated that the designation of land for employment-supporting development will help stem the flow of workers out of the county, which would, in turn, lead to a better balance between jobs and housing.*

A-3-65. Will County amend Housing Element if additional policies or mitigation measures are necessary to address impacts?

*The County has reviewed the adopted Housing Element and has determined that it is consistent with the Countywide General Plan. Amendment of the Housing Element is, therefore, not required.*

A-3-66. Not clear how housing policy will be accomplished.

*The Housing Element, which was adopted in June 1992, includes an implementation program to effect this policy commitment.*

A-3-67. Not clear how housing policy will be accomplished.

*See response to comment A-3-66.*

A-3-68. Policy unclear

*The County feels that this adopted Housing Element policy is stated clearly.*

A-3-69. More information on implementation of policy should be provided

*See response to comment A-3-66.*

A-3-70. Not clear how housing policy will be accomplished.

*See response to comment A-3-66.*

A-3-71. How will fee waiver policy affect market rate housing?

*The County will consider the waiver of fees on a project-by-project basis, stating findings as necessary where such waivers are granted.*

A-3-72. Draft EIR should provide a range of cost estimates for all required municipal facilities

*The level of specificity necessary to arrive at meaningful cost estimates for the types of facilities and services indicated exceeds what is necessary to assess the potential infrastructure impacts of a general plan. The type of analysis suggested is beyond what CEQA requires.*

A-3-73. Draft EIR should describe fiscal impacts of new growth areas.

*The General Plan includes policies and programs to ensure that the proponents of development projects demonstrate that their projects do not create a fiscal burden on the County. The type of analysis suggested is beyond what CEQA requires. See also common response #5.*

A-3-74. New growth areas inconsistent with policy requiring adequate service availability

*The statement to which the commentor refers is accurate; the policies of the Policy Document stipulate that new development shall not occur unless infrastructure and services are available at the time the development takes place.*

A-3-75. Draft EIR needs to address impacts on services and facilities provided by cities

*Refer to response to comment A-3-3.*

A-3-76. Draft EIR should address location of drainage and flooding impacts in more detail

*The County believes the level of detail provided in the EIR is appropriate for a general plan EIR.*

A-3-77. Draft EIR does not clearly state if additional upstream runoff will contribute to Roseville's existing flooding problems

*The EIR cites Policy Document policies and programs designed to reduce potential flooding impacts to a less-than-significant level through regional cooperation in addressing such potential problems.*

A-3-78. Draft EIR should analyze use of groundwater in new growth areas

*Policy Document policies addressing water supply require the use of surface water for potable supply in urban-level development.*

A-3-79. Draft EIR conclusion of no impact to ground and surface water quality is not substantiated

*The County believes the EIR's analysis includes a sufficient amount of information to support its conclusions.*

A-3-80. Draft EIR does not state if cumulative water quality impact is significant and unavoidable

*The Final EIR clarifies the discussion of cumulative water quality impacts.*

A-3-81. Draft EIR should provide more detailed information on wastewater system impacts and feasibility of system improvements

*The County believes the level of detail provided in the EIR is appropriate for a general plan EIR.*

A-3-82. Draft EIR does not address surface discharge requirements for treated wastewater

*Policy Document policies addressing wastewater require new development to address surface discharge requirements. The EIR assumes that these policies will be enforced.*

A-3-83. Draft EIR should identify Roseville drainages receiving wastewater from unincorporated development

*The drainage analysis in the EIR provides sufficient information to determine which drainages will be affected by development in the unincorporated county.*

A-3-84. Draft EIR wording regarding on-site wastewater treatment is unclear

*The phrase should read "addressed," rather than "identified." The Final EIR includes this correction.*

A-3-85. Roseville Regional WWTP master plan does not anticipate development of new growth areas

*The two new growth areas that the DEIR indicated would have been most reliant on the Roseville WWTP have been removed from the Land Use Diagram.*

A-3-86. Draft EIR statements regarding agricultural irrigation demands are not clear

*The Final EIR has been modified to eliminate the confusion.*

A-3-87. Roseville Regional WWTP master plan does not anticipate development of new growth areas, so Draft EIR should identify other facilities

*Refer to response to comment A-3-85.*

A-3-88. Draft EIR should more thoroughly address availability of potable water for new development

*The specificity of the EIR's analysis is sufficient for a general plan EIR. The policies and programs of the Policy Document will ensure that development projects demonstrate that water supply is available and the EIRs on these projects will have to document this availability. The County would also like to point out that the court case cited in the comment pertained to a project-level analysis, as opposed to a planning-level analysis.*

A-3-89. Draft EIR should identify formal mitigation measures to alleviate water supply impacts

*Refer to common response #2.*

A-3-90. Draft EIR should address policy consistency issues for all new growth areas and all resource issues

*The County disagrees with the commentor's apparent conclusion that the EIR and Policy Document are inconsistent.*

A-3-91. Accuracy of numbers in Draft EIR Table 5-1 should be confirmed

*The referenced table has been revised for the Final EIR to reflect water demand associated with assumed development at 2010 and 2040.*

A-3-92. Draft EIR should address mitigation of water treatment needs

*The adoption of the General Plan will not result in development entitlements. The policies and programs of the Policy Document will ensure that no development entitlements will be granted without demonstrated long-term reliable water supply.*

A-3-93. Draft EIR should address impacts of location of residential development near landfill

*The Stanford Ranch West specific plan area, which might have included residential designations near the landfill, no longer appears on the Draft Land Use Diagram.*

A-3-94. New growth areas are inconsistent with rest of the *Draft Plan* because they are not necessary to accommodate demand and they will cause premature conversion of agricultural land.

*The EIR concludes that loss of farmland and agricultural production will be significant adverse impacts of potential development under the Policy Document, even with the removal of two of the new growth areas from the Land Use Diagram.*

A-3-95. New growth areas are inconsistent with agricultural preservation policies

*Refer to response to comments A-3-12 and A-3-94.*

A-3-96. *Draft EIR* should consider alternatives to the project as mitigation of agricultural land impacts

*Refer to common response #2.*

A-3-97. *Draft EIR* should address state, as well as federal, protected species

*The EIR analysis addresses both categories of protected species.*

A-3-98. *Draft EIR* should address cumulative impacts on Swainson's hawk

*The EIR habitat analysis addresses Swainson's hawk habitat.*

A-3-99. *Draft EIR* should state whether the *Draft Plan* can protect resources better than alternatives

*Chapter 10 of the Final EIR concludes that the General Plan, as revised, and the other alternatives considered would protect resources better than the Draft Plan would have.*

A-3-100. *Draft EIR* should analyze alternative sites for development as mitigation to habitat conversion

*Refer to common response #1.*

A-3-101. *Draft EIR* should analyze impacts on oak and riparian woodlands resulting from construction in new growth areas

*Policy Document policies and programs require that new development mitigate wetland and riparian habitat losses. Refer to common response #1 regarding alternatives.*

A-3-102. *Draft EIR* should address visual impacts associated with loss of open space in new growth areas

*The new growth areas that are the subject of this comment no longer appear on the Land Use Diagram.*

A-3-103. *Draft EIR* should identify requirement of field surveys in new growth areas as mitigation of loss or disturbance of cultural resources

*Policy Document policies and programs call for the protection of cultural resources and require project-level analysis for all discretionary development projects.*

A-3-104. Draft EIR should identify mitigation measures for impacts on Roseville's roadways

*Refer to common response #3.*

A-3-105. Draft EIR should identify how roadway impacts would change if unfunded improvements were removed from assumed network

*Refer to common response #3.*

A-3-106. Draft EIR should address the cost of improvements without identified funding sources

*Refer to common response #3.*

A-3-107. City opposes Draft EIR assumptions about Foothills Boulevard improvements

*The extension of Foothills Boulevard to Lincoln was included in the City of Roseville's General Plan EIR under the analysis of the "2010 Specific Plan Buildout Scenario," and is also shown in the City of Lincoln's Public Facilities Element. This facility will eventually be needed as a parallel route to State Route 65 to accommodate short distance travel between Lincoln and Roseville.*

A-3-108. Draft EIR must consider east-west roadways that go around, rather than through, Roseville

*In preparing the Circulation Plan Diagram, the County did consider such alternatives, but rejected them as ineffective solutions to regional east-west traffic.*

A-3-109. Does Rocklin's circulation element include north-south connector between Lincoln and Rocklin

*This north-south connector is not currently on Rocklin's circulation element due to the low residential density allowed in the Sunset Ranchos development. The City of Lincoln does include this roadway in their circulation element. Discussions have been held recently between Rocklin, Lincoln, and Caltrans concerning this north-south connector.*

A-3-110. Draft EIR identifies unrealistic roadway improvements

*Table 4-24 in the EIR presents those roadways that would not operate at unacceptable levels of service in 2040 without further mitigation beyond those included in the "2040 Base Transportation System." As noted in the Draft EIR, the transportation analysis focused on 2010 travel demand and needs. The 2040 transportation analysis was conducted so that transportation corridors that would be needed beyond 2010 could be identified. Table 4-24 also includes a general indication of the roadway lanes that would be needed to achieve level of service standards by 2040. The Draft EIR also notes that the required lanes may not be feasible or desirable to implement and alternative mitigations may be possible such as new or widened parallel roadways, grade separations, significant transit, and/or travel demand management measures, etc. (Also see Common Response #3.) The text related to proposed improvements on Cirby Way (shown in Table 4-7) has been corrected in the Final EIR.*

A-3-111. Draft EIR should analyze stationary sources of air pollution

*The EIR presumes that stationary sources will be regulated by PCAPCD, and Policy Document policies support the enforcement of APCD regulations.*

A-3-112. *Draft EIR* should incorporate TCMs from Air Quality Attainment Plan by reference

*The Policy Document explicitly calls for the County to enforce the provisions of the AQAP; it would be inappropriate for the County to incorporate by reference a plan over which it does not have jurisdiction.*

A-3-113. *Draft EIR* should address noise impacts in Roseville's residential areas in more detail

*The County believes the level of detail provided in the EIR is appropriate for a countywide general plan EIR.*

A-3-114. *Draft EIR* thresholds of significance for noise should reference City of Roseville's standards

*Refer to response to comment A-3-113.*

A-3-115. *Draft EIR* should provide noise contour maps and data for roads within Roseville

*Refer to response to comment A-3-113.*

A-3-116. *Draft EIR* does not address how noise impacts will be addressed in already-developed areas affected by increased traffic congestion

*Refer to response to comment A-3-113.*

A-3-117. *Draft EIR* should indicate that alternatives to new growth areas would mitigate noise impacts

*Refer to common responses #2 and #11.*

A-3-118. *Draft EIR* summary section lacks information required by CEQA Guidelines

*The County feels that the summary of impacts, in combination with the body of the EIR analysis, satisfies the requirements of the State CEQA Guidelines. The EIR does not isolate impacts resulting from development within Roseville, nor does CEQA require such isolation.*

A-3-119. City of Roseville NOP comment letter incorporated by reference

*Refer to responses to comments A-3-21 to A-3-40.*

A-3-120. *Draft Plan* should include policy related to affordable housing in new growth areas

*The Policy Document and the adopted Housing Element include numerous provisions for affordable housing that are applicable throughout the unincorporated area of the county.*

A-3-121. Comment on jobs-housing balance discussion in *Draft Background Report*

*This comment refers to the Draft Background Report, which has been revised.*

A-3-122. *Draft Plan's jobs-housing goal appears to establish a conflict between existing urban areas and new growth areas*

*Comment noted. The County recognizes that the new development in the unincorporated areas will compete for development with existing urban areas.*

A-3-123. *Draft Plan's economic development policies are inconsistent with conversion of industrial land to residential land in Stanford Ranch West*

*The Stanford Ranch West Specific Plan Area no longer appears on the Land Use Diagram.*

A-3-124. *Draft Plan's standards for new growth areas should include policy related to affordable housing*

*The referenced standards have been removed from the Policy Document. Refer to response to comment A-3-120.*

A-3-125. *Observation about development scenario in Table 2-7 of Draft EIR*

*Comment noted; no response necessary.*

A-3-126. *Draft EIR development scenario assumes new growth areas will absorb 35 percent of residential demand projected in Roseville's market study*

*Comment noted; no response necessary.*

A-3-127. *Draft EIR development scenario assumes new growth areas will absorb 32 percent of non-residential demand projected in Roseville's market study*

*Comment noted; no response necessary.*

A-3-128. *Draft EIR recognizes employment growth rate is aggressive*

*Comment noted; no response necessary.*

A-3-129. *Draft EIR should address ability of development in new growth areas at 2010 to provide services and should reconsider need for new growth areas*

*Refer to responses to comments A-3-1 and A-3-3.*

A-3-130. *Comments A-3-122 and -123 also apply to Draft EIR*

*Refer to responses to comments A-3-122 and A-3-123.*

A-3-131. *Draft EIR does not analyze the fiscal effects of inclusionary zoning policies and fee waivers*

*The commentor is correct. The EIR does not include such an analysis. The Policy Document does, however, include provisions calling for project-level fiscal and financial feasibility analyses to address these concerns. Also refer to common response #5.*

A-3-132. *Draft EIR* does not adequately address recreation demands created by new residents

*The Policy Document has been revised to support organized, activity-oriented recreation programs in conjunction with urban and suburban development in the unincorporated county, although the policies call for special districts, recreation districts or public utility districts to operate such programs.*

A-3-133. *Draft Plan* standards for tennis and basketball courts are below national standards

*The County feels that the stated standards are appropriate for development in the unincorporated county.*

A-3-134. *Draft EIR* does not specifically mention archaeological resources in Roseville

*Comment noted; no response necessary.*

A-3-135. Why doesn't *Draft EIR* natural resource analysis include Roseville?

*The EIR and General Plan focus primarily on the unincorporated areas of Placer County. Each local agency, including Roseville, is responsible for the effects of development within its jurisdiction on local natural resources.*

A-3-136. *Draft Plan* and *Draft EIR* have very little information on law enforcement issues

*The EIR addresses the impacts of development under the General Plan on the provision of County services, including those specified in the comment.*

A-3-137. Circulation Plan Diagram designates Foothills and Blue Oaks Boulevards as arterials

*Comment noted; no response necessary.*

A-3-138. *Draft Plan* policies do not identify dramatic differences between law enforcement needs of urban and rural areas

*The County feels that the policies of the Policy Document are appropriate for a countywide general plan.*

A-3-139. *Draft EIR* describes County facilities, but not services, and does not address courts, probation, corrections, or District Attorney

*This comment is not accurate; these subjects are addressed in Chapter 6 of the EIR.*

A-3-140. *Draft Plan* and *Draft EIR* do not adequately address library services

*The omission of policy language dealing with libraries was an oversight. A policy addressing library services has been added to the Policy Document (see Policy 4.A.5 on page 61).*

A-3-141. *Draft EIR* should analyze and propose mitigation for traffic on Roseville streets; shouldn't assume extension of City streets, should identify east-west roadway.

*Refer to common response #3.*

A-3-142. Draft EIR Table 4-3 should include additional specified information

*Table 4-3 reflects PCTC's "Draft Funding Assured Project List" for their 1993 Regional Transportation Plan. The Sunrise Avenue/Douglas Boulevard intersection improvements were not included on PCTC's Draft List and thus did not appear in Table 4-3. However, this improvement was included in the "2010 Base Transportation System" evaluated in the Draft EIR, as well as PCTC's Project List in the adopted 1993 RTP. The jurisdictions shown on Table 4-3 reflect those used by PCTC, which did not include the Highway 65 Joint Powers Authority.*

A-3-143. Draft EIR Table 4-4 should not include unfunded roadway improvements

*As noted in the EIR, the estimated levels of population and employment within the cities of Lincoln, Rocklin, and Roseville indicated that portions of their urban reserve and proposed annexation areas would need to be developed by 2010 to accommodate their projected growth. The "2010 Base Transportation System," therefore, assumed several new roadways that would be needed to provide access to these areas. The roadways needed to serve the new growth areas in Roseville were based on the City's ongoing Comprehensive Land Use Element Update.*

A-3-144. Draft EIR Table 4-17 should be based on an intersection-level analysis, not a roadway-link analysis

*Refer to common response #3.*

A-3-145. Draft EIR Table 4-18 incorrectly identifies Foothills Boulevard as an existing 2-lane roadway north of Roseville

*Table 4-18 has been corrected in the Final EIR.*

A-3-146. Draft EIR Table 4-18: under Foothills Boulevard, Carlsberg Drive should be replaced with Pleasant Grove Boulevard

*Table 4-18 has been corrected in the Final EIR.*

A-3-147. Draft EIR Table 4-18 should not include segment of Junction Boulevard not included in City's General Plan and CIP

*The extension of Junction Boulevard to Fiddymont Road was listed as a mitigation measure in the EIR on the Del Webb Specific Plan and was assumed to be implemented by 2010 due to the assumed development in the urban reserve areas of the City of Roseville.*

A-3-148. Draft EIR should propose mitigation of roadway impacts not within jurisdiction of the County

*Refer to common response #3.*

A-3-149. Draft EIR should propose mitigation of roadway impacts not within jurisdiction of the County

*Refer to common response #3.*

A-3-150. Draft EIR Table 4-24 proposes roadway mitigation that is infeasible

*Refer to response to comment A-3-110.*

A-3-151. Draft EIR Table 5-12 underestimates impervious surface area increase through 2040; existing flood control plans don't anticipate new growth areas

*At the recommendation of the Placer County Flood Control and Water Conservation District, the referenced table has been removed from the Final EIR. See also common response #11.*

A-3-152. Draft EIR Table 5-10 indicates increase in impervious area in addition to "planned" increases.

*Comment noted; no response necessary.*

A-3-153. New growth areas will require storage volumes beyond those specified in flood control plans

*The new growth areas causing the concern expressed in this comment no longer appear on the Land Use Diagram. See also common response #11.*

A-3-154. There is no funding mechanism in place for Cross Canal Flood Control Plan projects in unincorporated areas or Auburn and Rocklin

*Comment noted; no response necessary.*

A-3-155. Draft EIR references to public transit should refer to plural operator(s)

*The Final EIR incorporates the recommended revision.*

A-3-156. Draft EIR should not refer to feeder bus service to LRT lines without funding

*This question is rhetorical; no response necessary.*

A-3-157. Draft EIR inaccurately describes short range transit plans (SRTP)

*The suggested revisions have been made in the Final EIR.*

A-3-158. City of Roseville is under contract with RT to prepare preliminary engineering and EIR studies for LRT extension to Roseville

*The reference has been added to the Final EIR.*

A-3-159. Draft EIR incorrectly implies that Proposition 116 monies for rail transportation capital improvements are still available

*The Final EIR has been revised to remove the reference to Proposition 116 funding.*

A-3-160. Draft EIR recommended text correction

*The recommended revision has been made in the Final EIR.*

A-3-161. Draft EIR needs to mention need for additional funding sources for transit capital and operations

*The recommended revision has been made in the Final EIR.*

A-3-162. Recommended text revision and observation about DEIR statement.

*The recommended text revision has been made in the Final EIR and the observation has been noted.*

A-3-163. Draft EIR does not adequately address impacts on transit services

*The County believes that the transit services analysis is appropriate for a countywide general plan EIR.*

A-3-164. Draft EIR does not provide solutions to lack of commuter-oriented transit

*The County feels that the policies and programs included in the Policy Document are appropriate for a countywide general plan. Furthermore, the commentor provides no constructive recommendations to illustrate her point.*

A-3-165. Draft EIR should include mitigation measures calling for "significant" participation in trip reduction ordinance programs

*The County feels that the policies and programs included in the Policy Document are appropriate for a countywide general plan.*

A-3-166. Draft EIR should recognize that new technology may address air quality problems, but not traffic congestion

*Numerous Policy Document policies and programs encourage and promote opportunities for alternative transportation that would address traffic congestion.*

A-3-167. Draft EIR should recognize that lack of staff and funding hinder implementation of a bikeway system

*The County understands the commentor's concerns. The Policy Document, accordingly, includes policies and programs that call for new development to contribute to implementation of a comprehensive pathway system. The requested references are, however, too specific for a countywide general plan.*

A-3-168. Draft EIR Transit, TSM, and Non-Motorized Transportation sections lack substance

*The County feels that the analysis is appropriate for a countywide general plan EIR, and that the policies and programs included in the Policy Document are appropriate for a countywide general plan. Furthermore, the commentor provides no constructive recommendations to illustrate her point.*

A-3-169. Draft Plan policy change recommendation

*Comment noted; recommended change not made.*

A-3-170. *Draft Plan* policy change recommendation

*Comment noted; recommended change not made.*

A-3-171. *Draft Plan* policy change recommendation

*Comment noted; recommended change not made.*

A-3-172. *Draft Plan* policy change recommendation

*Comment noted; recommended change not made.*

A-3-173. *Draft Plan* policy change recommendation

*Comment noted; recommended change not made.*

A-3-174. *Draft Plan* program recommendation concerning materials recovery facility

*The recommended program has been added to the Policy Document.*

A-3-175. New development areas do not currently have direct source of water, and Roseville cannot provide without exorbitant costs

*The Policy Document stipulates, and the EIR assumes, that new development will be required to provide for all infrastructure necessitated by the development. At the time that such development is proposed, the County will require that the providers of any services are consulted regarding the potential effects of the development; this would include the City of Roseville, if the development must rely on the City for any services and facilities.*

A-3-176. Roseville does not have excess treatment capacity to serve Dry Creek area

*Refer to response to comment A-3-175.*

A-3-177. Roseville's Water System Study does not consider serving Placer Villages

*The Placer Villages Specific Plan Area no longer appears on the Land Use Diagram.*

A-3-178. Roseville's Water System Study does not consider serving Villages of Dry Creek

*Refer to response to comment A-3-175.*

A-3-179. *Draft EIR* summary of impacts for Stanford Ranch West should mention reclaimed water for agricultural irrigation

*The Stanford Ranch West Specific Plan Area no longer appears on the Land Use Diagram.*

A-3-180. *Draft EIR* should conclude that water supply and distribution impacts will be significant

*County feels that the EIR's conclusion is accurate.*

A-3-181. *Draft EIR* should not assume that new growth areas will be able to rely on Roseville Regional Wastewater Treatment Plant

*Refer to response to comment A-3-175.*

A-3-182. *Draft EIR* Table 5-7 should use wastewater flow generation figures consistent with master plan for Roseville Regional WWTP

*The EIR uses the same wastewater flow factor for all analysis areas to ensure consistent comparison of the prospective impacts.*

A-3-183. *Draft EIR* should not conclude that water systems impacts will be less than significant

*County feels that the EIR's conclusion is accurate.*

A-3-184. *Draft EIR* Table 5-13 incorrectly states 1990 waste disposal for Roseville

*As noted in footnote 2 of Table 5-13 (Table 5-10 in the Final EIR), the solid waste generation figures cited in the table are the result of the application of a solid waste generation factor of 6.4 to the 1990 population. The EIR uses the same factor for all analysis areas to ensure consistent comparison of the prospective impacts.*

A-3-185. *Draft EIR* analysis of solid waste impacts should be more thorough

*Comment noted; no response necessary.*

A-3-186. *Draft EIR* analysis of solid waste impacts should be more thorough

*Comment noted; no response necessary.*

A-3-187. City of Roseville opposes accelerated review period for Issues and Options Report

*Comment refers to Issues and Options Report; no response necessary.*

A-3-188. Issues and Options Report discussion is based on faulty assumptions

*Comment refers to Issues and Options Report; no response necessary.*

A-3-189. Issues and Options Report does not adequately address impacts on City of Roseville facilities and services

*Comment refers to Issues and Options Report; no response necessary.*

A-3-190. Issues and Options Report does not sufficiently address fiscal impacts on the City of Roseville or the County

*Comment refers to Issues and Options Report; no response necessary.*

A-3-191. Board of Supervisors should defer decisions on Issues and Options Report until meeting with cities

*Comment refers to Issues and Options Report; no response necessary. It should be noted, however, that the County did meet with representatives of the Cities of Lincoln, Rocklin, and Roseville during the Issues and Options phase of the General Plan Update process.*

A-3-192. City of Roseville supports Land Use Alternative 1 from Issues and Options Report

*Comment refers to Issues and Options Report; no response necessary.*

A-3-193. Issues and Options Report underestimates amount of growth cities can accommodate

*Comment refers to Issues and Options Report; no response necessary.*

A-3-194. Issues and Options Report does not adequately address impacts on City of Roseville facilities and services

*Comment refers to Issues and Options Report; no response necessary.*

A-3-195. Issues and Options Report does not discuss fiscal impacts of growth in sufficient detail

*Comment refers to Issues and Options Report; no response necessary.*

A-3-196. Development concentrated within cities will result in a more logical and environmentally sensitive growth pattern

*Comment refers to Issues and Options Report; no response necessary.*

A-3-197. City of Roseville's recommended alternative for Issues and Options Report

*Comment refers to Issues and Options Report; no response necessary.*



PLANNING  
CITY OF ROSEVILLE  
TRADITION • PRIDE • PROGRESS

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October 14, 1993

Placer County Planning Department  
Attn: Mr. Loren Clark  
11414 B Avenue  
Auburn, CA 95603

SUBJECT: Comments on the Placer County General Plan Update and  
Draft Environmental Impact Report (DEIR)

Dear Mr. Clark:

On behalf of the City of Roseville, we are transmitting comments for consideration of the draft County General Plan Update and for response as part of the DEIR. Because of the extremely short time period for review of these documents before the first scheduled public hearing, these comments do not include all of the City's comments. Rather, we have attempted to identify major areas of concern and adequacy, and to the degree possible, provide the County with specific comments. Prior to the end of the statutory review period for the DEIR, the City will be submitting additional comments on both the Plan and the DEIR. Thank you in advance for your consideration and written response to these comments.

OVERALL COMMENTS

Throughout the Board of Supervisors' discussion of the Issues and Options Report, the City consistently voiced significant concerns with the proposal to amend the General Plan adding major growth areas in very close proximity to Roseville. Neither the General Plan Policy Document or the DEIR address these concerns. In fact, both documents evade these issues and do not propose any mitigation that is reasonably achievable to alleviate adverse effects on the City of Roseville. The City's concerns continue to be:

1. Adequate areas suitable for urban growth for the next twenty years already exist in the County and Cities, and the addition of the new growth areas in the County are not needed to meet reasonable market projections.
2. Impacts of locating approximately 33,332 dwelling units with a projected population of 98,000 people adjacent to or in close proximity to Roseville will

A-3-1

have significant adverse impacts. These include:

-traffic and circulation impacts to Roseville collector and arterial streets, which based on the existing DEIR analysis are infeasible to mitigate; and

A-3-2

-increased demand for City of Roseville services and facilities, without the provision for reimbursement, including fire and police protection, parks and recreation facilities and programs, and libraries.

A-3-3

3. The development of the proposed growth areas will result in urban sprawl from Loomis to the borders of Sacramento and Sutter Counties, as the Plan and DEIR do not include adequate mitigation and there are no reasonable assurances that implementation of proposed buffers will be successful.

A-3-4

For these reasons, the City of Roseville continues to support Option 1 of the Issues and Option Report, directing new urban growth into the Cities.

A-3-5

COUNTY GENERAL PLAN - Draft Policy Document

1. Previous Comments on the General Plan Background Report. Insofar as the General Plan is comprised of both the Policy document and the Background Report, we are incorporating by reference the City's comments, dated March 11, 1993, which have not been responded to nor have resulted in any revisions to the General Plan documents. These comments relate to both the General Plan documents and to the DEIR and should be addressed in the Final EIR. A copy of this letter is attached for your information and response.

A-3-6

2. General Plan Format is confusing and difficult to review. As noted above the City, as well as other agencies and the public, submitted extensive comments on the Background Report which was circulated for public review in December 1992. Based on this review and despite significant comments, no revisions have been made (to our knowledge). Further, this document was not circulated with the draft General Plan. As this document provides the "supporting documentation for general plan policy", review of the Policy document without this information is extremely difficult. As previously

A-3-7

pointed out, the Background Report includes inaccuracies and is a very dated document considering the Board's action on the Issues and Options Report. Based on this, the Policy document is missing adequate information critical to addressing statutory requirements of the General Plan.

A-3-7

Further, the Issues and Options Report is not incorporated by reference as part of the General Plan, yet the Policy document states that this report solicited direction from the Board of Supervisors on key issues to be addressed in the General Plan update, and that "this direction provided the framework for the development of the goals, policies, implementation programs, and land use and circulation plans contained in the Draft General Plan Policy Document". (Policy Document, 5.)

A-3-8

Because inaccuracies in these documents have not been corrected and have in turn provided the basis for the General Plan Policy Document and EIR, the resulting policies and EIR analysis are not coordinated and are erroneous.

A-3-9

3. The Elements of the General Plan are internally inconsistent. State planning law requires that a General Plan be internally consistent. Specifically, Government Code Section 65302(b) requires that the circulation element be fully integrated with the land use element. The circulation element does not address circulation problems resulting from the land use element proposals, specifically as it relates to the new growth areas. As drafted, the General Plan does not include any proposals to lessen traffic impacts to the City of Roseville yet it acknowledges that the new growth areas will require the extension of City arterials and collectors to provide connections from these areas to regional transportation routes (I-80 and Highway 65).

A-3-10

These connections will have a severe adverse effect on the City of Roseville, as we have seen with Granite Bay traffic impacts on Douglas Boulevard. Proposed County policies do not require that these impacts be mitigated prior to approval of entitlements. In addition, the policies permit a level of service on City maintained roads that are inconsistent with the City's General Plan. The only requirement is that "The County shall work with neighboring jurisdictions to provide acceptable and compatible levels of service and joint funding...". The County's plan proposes levels of service on City roads that are inconsistent with policies of the Roseville General Plan. Why would the City want to enter into joint funding programs that could result in very adverse

impacts to the City (e.g. eight lanes on Cirby Way). This is the only proposed remedy for traffic impacts to the City and there is no reasonable assurance of it's success.

A-3-10

Other examples of internal inconsistencies include:

- Policies seek the long term protection of lands designated for industrial use in the Sunset Community Plan area. Based on this policy, the County is proposing that the City eliminate the City's Sphere of Influence which includes some of the Sunset area, in an effort to assure future industrial growth. Yet much of this area is also included in the Stanford Ranch new growth areas where a new community of 22,500 people are proposed to reside. This also clearly conflicts with policies related to the long term use and protection of the regional land fill and buffering of residential and industrial uses (land fill and City operated electrical facility located in this area).

A-3-11

- There is no consistency between policies directed to preserving viable agricultural production and the proposed new growth areas. The new growth areas will not only impact those areas proposed to be converted to urban use but will also result in fragmentation of agricultural acreage and will adversely effect long term viability of such operations.

A-3-12

- Urban Separator Buffer polices would permit one acre parcels to be developed between two urban areas (Policy Document, p.5). Beyond the City's concern that this will not provide an adequate buffer, policies addressing buffer zone preservation require "land acquisition, purchase of development right, conservation easements, etc". How will this be reasonably implemented on very small residential parcels? Permitted uses in the buffer area and the proposed intent of the buffers are not consistent.

A-3-13

- The plan does not identify feasible measures to implement the Plan policies. While the plan does include some implementation measures, these are not clearly linked to specific policies and in many instances it appears that no implementation measures have been identified for the majority of the plan policies.

A-3-14

Because of these internal inconsistencies, the General Plan Policies do not address the City's concerns that an adequate supply of land exists for future urban development, assure that the impacts to Roseville will be mitigated, and will not

A-3-15

preclude urban sprawl.

4. The General Plan Text and Land Use Diagram are inconsistent. Policies of the General Plan require a variety of buffers (agriculture, industrial, sensitive habitat, urban separator, etc.) and further, require that such buffers be internalized into new growth areas. These are not reflected on the land use diagram, and if they were to be incorporated, we question the feasibility of incorporating such boundaries as the resulting area available for development may be minimal (e.g. urban separator between Roseville and Stanford Ranch West, plus industrial buffer and public facilities buffer between electric generation plant and the regional land fill). This leads to a concern as to whether the proposed buffers, if infeasible, will have any of the Plan's proposed effects.

Policies of the General Plan also call for the protection of agricultural lands, maintenance of agricultural lands in a size sufficient to retain viable farming units, and encourage infill development in urban areas as an alternative to expanding urban boundaries into agricultural areas (Policies 7.A.1, 7.A.7 and 7.A.8, p. 103). The land use diagram is clearly inconsistent with these policies as it designates new growth areas within existing agricultural areas, creates areas between urban areas that will not be viable for agricultural production, and does not encourage infill development.

The land use diagram, circulation plan diagram and designated transit corridors are inconsistent with plan policies. This is especially a concern for new growth areas, where the stated General Plan objective for the Placer Villages and Stanford West Specific Plans are to be self-sufficient communities and to facilitate modes of transit other than the automobile. The Circulation Plan diagram, and projected trips, clearly indicate that the principal mode of transportation beyond the year 2010 will be the automobile. At the same time, the Plan designates transit corridors with the stated intent that these are to guide future land use decisions specifically in new growth areas with regards to higher intensity residential development and employment centers. Potentially contrary to this are the specific development standards for new growth areas, where it is stated that there is no assurance as to total dwelling units that ultimately can be developed due to site constraints, buffers, etc. and there are no standards requiring that the specific plans be designed to develop residential at locations or densities high enough to support transit (light rail or bus).

A-3-15

A-3-16

A-3-17

A-3-18

DRAFT EIR

In Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 564, the court found that:

"The core of an EIR is the mitigation and alternatives sections."

To allow agencies to avoid or mitigate significant environmental impacts at the findings stage of the CEQA process, EIRs "must produce information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned." (San Bernardino Valley Audubon Society, Inc. v. County of San Bernardino (1984) 155 Cal.App.3d 738, 750-751, see also Citizens of Goleta Valley v. Board of Supervisors ("Goleta I") (2d Dist. 1988) 197 Cal.App.3d 1167, 1179; Laurel Heights Improvement Association of San Francisco v. Regents of the University of California (1988) 47 Cal.3d 376, 405-406.)

Considering the magnitude of the General Plan update in terms of provision of significant new growth areas and the identified impacts that will result to the City of Roseville, it is inconsistent with the provisions of the California Environmental Quality Act (CEQA) that there are no mitigation measures identified. Yet for every impact identified, there are feasible mitigation measures or environmentally superior alternatives. While it is not uncommon for a General Plan document to be "self mitigating", that is that the policies of the General Plan reduce the potential impacts to less than significant, as noted above, this has not occurred with these documents. Mitigation measures must be identified and alternatives thoroughly analyzed.

A-3-19

The alternatives analysis in the EIR is also grossly deficient. The EIR cites requirements from the CEQA Guidelines and case law regarding alternatives, and then fails to comply with the requirements. (EIR, 10:1-2.) The major problem with the "alternatives analysis" is that there is absolutely no analysis in the EIR. The EIR says the analysis is required but fails to do it apparently because it would be burdensome and "would provide little utility in terms of helping the County "define" or "redefine" the project". (EIR, 10-4.)

A-3-20

However, the objective of the analysis is not to help the project proponent to "define" the project. The objective is to establish which alternative is environmentally superior. The EIR at 10-4 concedes that it ignores alternatives and focuses exclusively on the "project", in violation of the CEQA regulations cited in the EIR on the preceding two pages. It is apparent that the drafters of the EIR intentionally ignored the purpose of alternatives analysis.

The EIR indicates that the alternatives analysis was conducted in a separate document, the "Issues and Options Report" ("IOR") (EIR, 10-4). It is legally acceptable to incorporate by reference another document into an EIR, but in this case the EIR does not explicitly state that the IOR is incorporated by reference.

Furthermore, according to the CEQA Guidelines, incorporation by reference is not an appropriate technique in this case. (CEQA Guidelines §15150.) Typically, incorporation by reference involves a situation where a prior environmental document is incorporated into a more recent document. Although other types of documents can be incorporated by reference, "incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand." (CEQA Guidelines §15150.) The IOR, on the other hand, is not long, descriptive or technical. Furthermore, rather than providing general background, the IOR provides the entire alternatives analysis. Finally, it does contribute directly to the analysis of the problem at hand. Thus, a good argument can be made that the IOR cannot be incorporated by reference and should not be considered as part of the EIR.

A-3-20

However, even if the IOR is considered, the analysis is flawed in various respects. The EIR states that the IOR satisfies "the spirit of CEQA's requirement to address alternatives" (EIR, 10-3), but the IOR actually meets neither the letter nor the spirit of CEQA. The most significant problem with the IOR is its complete lack of comparison between the proposed Project and rejected alternatives. This is the very essence of the requirement that alternatives be considered. (Laurel Heights Improvement Association v. Regents of University

of California (1988) 47 Cal.3d 376.) This lack of comparison should have been foreseen by the drafters because when the IOR was prepared and reviewed, the "Project" as it is now defined had not been established or even considered. Only after reviewing the IOR, did the Board determine that a hybrid land use alternative, called "Alternative 5", should be pursued. Furthermore, the "new towns" were not included in the General Plan until after completion of the IOR and are not analyzed in the IOR. Thus, it is impossible for the IOR to fulfill the essential role of comparing the "Project" to alternatives because the IOR did not include consideration of the most important information. The lack of any meaningful comparison between Alternative 5 and the other alternatives renders the entire discussion totally defective.

Furthermore, the IOR was not intended to and does not meet CEQA requirements as an alternative analysis. The sections of the IOR, although in some respects similar to EIR components, do not track CEQA. For example, the IOR does not discuss cumulative impacts or growth inducing impacts, and traditional CEQA terminology (significant impacts, etc.) is totally absent. It is quite clearly not an environmental document and this fact is candidly conceded in the "County-wide General Plan Draft Policy Document" (Policy Document) which states as follows:

A-3-20

"The purpose of the (IOR) was to solicit policy direction from the Board of Supervisors on key issues to be addressed in the General Plan Update. This direction provided the framework for the development of the goals, policies, implementation programs, and land use and circulation plans contained in the Draft General Plan Policy Document." (Policy Document, 5.)

Although the EIR attempts to evaluate "Alternative 5", the County might contend that much of the IOR's discussion of Alternative 3 (new growth areas) would be pertinent. However, this assumption is incorrect because Alternative 3 is based on a single new town of 20,000 inhabitants (IOR, 2-6) and the Project consists of several new towns consisting of over 40,000 units (EIR, 2-4), or approximately 100,000 people. Thus all of the adverse effects associated with Alternative 5 will be far

more severe than under Alternative 3.

Furthermore, even if we were to assume that a comparison to Alternative 3 could be considered a comparison to the Project, major problems remain. The IOR compared the 3 alternatives ((1) growth directed toward established cities, (2) existing conditions continued, and (3) new growth areas), but it did not reach a conclusion as to which alternatives were environmentally superior. This probably is due at least partly to the fact that the IOR was not written as an environmental document. However, the essence of the alternative analysis is comparison and discussion as to why an environmentally superior alternative was not chosen. (Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d 692.) The IOR does not provide this.

A review of the three alternatives indicates that Alternative 1, directing growth to existing cities, is the preferred alternative in virtually every category discussed. The only clear benefit from Alternative 3, the "new growth area" alternative, is that the County would benefit fiscally. Although fiscal issues may influence policy decisions, fiscal impact is not an appropriate consideration under CEQA. (San Franciscans for Reasonable Growth v. County of San Francisco (1989) 209 Cal.App.3d 1502.) However, the fact that the "new growth area" alternative causes the most serious environmental impacts is not addressed anywhere in the EIR or IOR.

A-3-20

In Sierra Club v. City of Roseville (Superior Court, No. S-1100; the Roseville Hospital case) the court ruled:

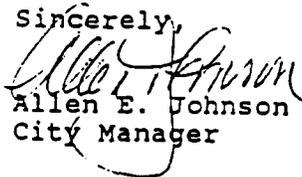
Alternatives to a proposed project must be discussed in enough detail to enable meaningful public review. The discussion must be specific enough to permit informed decision making and public participation, especially when the Lead Agency is also the project proponent or closely related to the proponent. Laurel Heights Improvement Association v. Regents of UC (1988) 47 Cal.3d 376, 403-405.

The alternatives analysis is clearly not in compliance with CEQA or recent court actions.

The EIR also violates Placer County's own Environmental Review Ordinance (Ordinance) adopted in 1990 and revised in 1992. Ordinance §31.618(D) describes the nature of the alternatives analysis required in an EIR. These requirements, essentially drawn from the CEQA regulations, are not met in the EIR. A-3-20

Additional comments on the DEIR are attached for the County's consideration and response. Unfortunately, the short time period has not permitted the City to consolidate these in a better format for your review. Also, as noted in the opening of this letter, these comments do not reflect all of the City's comments and additional comments will be submitted prior to November 15, 1993.

Sincerely,

  
Allen E. Johnson  
City Manager

ATTACHMENTS: Additional Comments

1. Comments on the NOP - August 30, 1993
2. Comments on Placer County General Plan Background Report - March 11, 1993
3. Comments from Community Development Department - October 14, 1993
4. Comments from Housing Division - October 14, 1993
5. Comments from Parks and Recreation Department - October 12, 1993
6. Comments from Police Department - October 6, 1993
7. Comments from City Librarian - October 8, 1993
8. Comments from Engineering Division - October 13, 1993
  - A. Traffic
  - B. Drainage
9. Comments from Transit Division - October 12, 1993
10. Comments from TSM Coordinator - October 12, 1993
11. Comments from Environmental Utilities - October 12, 1993
12. Comments on Placer County Update from Planning Department - February 8, 1993
13. Comments on Placer County Update from Mayor Bill Santucci - March 22, 1993

cc: City Council  
City of Rocklin  
City of Lincoln  
City of Loomis



COMMUNITY DEVELOPMENT  
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ATTACHMENT # 1

318 VERNON STREET, #102 · ROSEVILLE, CA 95678  
PHONE: (916) 774-5334

August 30, 1993

Loren Clark, Senior Planner  
Placer County Planning Department  
11414 "B" Avenue  
Auburn, California 95603

Regarding: Notice of Preparation for the Placer County General  
Plan Update Draft Environmental Impact Report

Dear Loren:

The City of Roseville Community Development Department appreciates the opportunity to comment on the Notice of Preparation (NOP) for the Placer County General Plan Update Draft Environmental Impact Report (DEIR). Given the significance of this update, and the impact it will have on Placer County and all of its cities, we request that Roseville's concerns be thoroughly addressed in the DEIR.

1. IMPACT TO ROSEVILLE

By far, our most important comment is that development of three new growth areas on the borders of Roseville will result in significant unavoidable significant impacts to Roseville, our citizens, the environment and our public facilities. As previously stated to the Board of Supervisors, the City of Roseville is very much opposed to the current direction of the general plan update.

A-3-21

2. ADEQUATE AREAS SUITABLE FOR GROWTH ALREADY EXIST AND UNDERESTIMATION OF GROWTH POTENTIAL

Based on existing land use plans (including both incorporated and unincorporated areas of southern Placer County) and lands suitable for development within incorporated boundaries, there is an adequate supply of developable land to meet current 2010 growth projections. The EIR should discuss the impact of creating an immense surplus of such lands beyond a projected twenty year demand. This analysis should include the potential effects of providing land use to meet an unidentified fifty year demand (and the inaccuracies with such growth projections), the premature conversion of resource production areas, and the induced effect that an oversupply of developable land may have on piecemeal, uncoordinated planning and development in the South Placer Region.

A-3-22

This impact is further exacerbated by the proposed project not reducing development entitlements where current County land

use designations reflect unrealistic development potential. The DEIR must quantify potential development opportunities and impacts associated with such development in these areas as part of the cumulative growth analysis.

The County has considerably underestimated the amount of growth that the cities, including Roseville, could absorb over the next twenty years. The estimates for Roseville are significantly less than the City has currently received applications for and is in the process of analyzing as part of its Comprehensive Land Use Element Update. As an example, the 2010 estimates utilized by the County are 31,000 to 38,000 residents short of the 122,400 residents estimated for Roseville by Recht Hausrath and Associates, with the estimated "build out" approximately 50,000 residents less than the 140,700 residents that the City is currently analyzing. This underestimation results in a significant overestimation of growth that the unincorporated portions of the County can reasonably expect to capture, bringing into question the need for the County to be considering new growth areas at this time.

A-3-22

### 3. FISCAL IMPACTS OF GROWTH

County development that borders Roseville will use city services and facilities that the County does not provide, or provides at a lower service level than that provided by the City. The impacts to service and the cost to the City need to be defined. Mitigation for these impacts should be identified and reimbursement to the City should be provided. Reimbursement by the County (and new development) should follow the same methodology as was used by the County to estimate costs of providing services to the cities.

A-3-23

Additional issues that should be considered include the cost of providing urban level services in the unincorporated County versus the cities, the impact to the County of the eventual incorporation of new towns or annexation to adjacent cities, and impacts to the market in both the cities and County should urban development be pursued in unincorporated areas.

### 4. EFFICIENT ACCOMMODATION OF GROWTH

Planning for future development needs within incorporated areas can result in a more logical and environmentally sensitive growth pattern. Roseville, as well as the other Placer County cities, will continue to expand and aggressively plan for growth over the foreseeable future. By planning growth within the incorporated cities, or in areas to be annexed by the cities, density is concentrated into existing urbanized areas where it can more efficiently be accommodated,

A-3-24

helping to remove development pressures from existing open space and agricultural lands. If the County were to pursue new towns or other urban development in unincorporated areas in addition to the growth being planned by the cities, the result could be piecemeal, premature sprawl.

A-3-24

5. JOBS/HOUSING BALANCE AND AFFORDABLE HOUSING

Discussions and policy direction on the part of the Board of Supervisors appears that they are under an incorrect assumption that they are powerless in assuring a reasonable jobs/housing balance and have, therefore, relinquished control to the market place. This is an incorrect assumption and following an EIR analysis of projected types of jobs, income, and housing prices, mitigation measures such as phasing of residential versus (job producing) non residential development through development agreements, timing of granting entitlements, etc., and mandatory provision of affordable housing should be identified.

A-3-25

Further, the claims made by the new County growth areas that affordable housing will be produced is highly questionable and should be analyzed. The County's cost of service analysis indicates that a house within the unincorporated area would need to sell for a minimum of \$200,000 just to break even. Based on this analysis, how will affordable housing be produced that is also not a fiscal drain on the County?

6. GROWTH-INDUCING IMPACTS

The DEIR should address growth-inducing impacts to the City of Roseville. The proposed addition of 30,000 people immediately adjacent and north of Roseville, and another 40,000 people just west of Roseville will contribute to urban sprawl already widespread throughout the Sacramento metropolitan area.

A-3-26

7. INDUSTRIAL/RESIDENTIAL LAND USE COMPATIBILITY

The general plan update includes proposed residential in an area currently known as the Sunset Industrial Area. The NOP states:

"General Plan land use designations will permit commercial, professional and residential development adjacent to the Western Regional Sanitary Landfill in the Sunset Industrial area."

A-3-27

How will the County ensure compatibility between existing industrial land uses, such as Ultrapower and the regional landfill and the proposed residential land uses? Negative

externalities, including noise, odor, and hazardous materials from existing uses and future industrial land uses could impact the residential uses. Residential land uses could limit use of industrial facilities. It is critical that the regional landfill be protected, because without adequate landfill capacity, existing development would be significantly impacted and future development would not be viable. As the land fill and proposed residential land uses are clearly incompatible, the DEIR should discuss impacts and opportunities to relocate the land fill site.

Roseville is also concerned that eliminating or significantly reducing the industrial land use in the Sunset Industrial Area will adversely impact the ability to attract industrial jobs to Placer County. This area plays an important role in providing a land base for industrial uses, including heavy industrial, which may not be available or appropriate elsewhere in the County or incorporated areas. The appropriateness of industrial uses in this area relates to a number of unique factors including its overall size, existence of heavy industrial uses including the land fill and Ultrapower, and proximity to rail access and Highway 65. The EIR should analyze what other opportunities exist within the County to absorb heavy industrial uses, and how the elimination of industrial use in the area will impact the ability to attract heavy industrial users to Placer County.

A-3-27

#### 8. DISTINCTION BETWEEN COMMUNITIES

Three new development areas will abut the City of Roseville. Substantial buffers, large enough to accommodate economically viable agricultural use should be provided between the new development areas and Roseville. One to five acre rural residential parcels are not adequate to create a permanent transition or accommodate agricultural use.

The buffers, to adequately mitigate impacts, must provide the following benefits:

- o reduce the potential for the appearance of urban sprawl,
- o create definable communities;
- o reduce the potential for incompatibility between land uses in the adjacent communities;
- o provide a permanent separation of land use patterns; and
- o provide an open space connection between the communities.

A-3-28

What permanent mechanism (Transfer of development rights, deed restrictions, etc.) to ensure long term retention of the buffers will be used?

9. TRAFFIC AND CIRCULATION

The County should consider cumulative traffic impacts to Roseville (PFE Road, Foothills Boulevard, Blue Oaks Boulevard, Baseline Rd/Main Street, etc.) from the proposed new growth areas. By placing new growth areas west of Roseville, motorists are forced to travel through Roseville streets to reach Interstate 80 (I-80) and Highway 65.

The NOP states:

"Policies will also insure that new urban development will pay for the transportation facilities needed in order to meet the demands generated by that [new] development."

Past performance by the County has shown that they have not mitigated significant traffic impacts to Roseville from County projects. The City is currently looking at a total of \$15 million in improvements to the Sunrise/Douglas intersection to meet a LOS C. Approximately 28% of the trips resulting in the need for the improvements are not attributable to Roseville, but come from surrounding communities such as Granite Bay.

A-3-29

To adequately mitigate these impacts, the EIR should require the establishment of a regional fee. This fee should not only mitigate short term impacts but should also insure that development within the unincorporated areas will not consume capacity on City roads that will be needed at its planned, ultimate build-out and that required improvements to maintain the City's adopted LOS C can be feasibly constructed.

The County should consider development of a new regional transportation corridor (as part of this general plan update) to move vehicles from southwest and southeast Placer County, around Roseville, to Interstate 80.

10. FLOODPLAIN IMPACTS

The NOP states that the project may result in increased flood levels in Placer County. The DEIR should explain how this will contribute to the cumulative flood problem in Roseville? Will new development contribute to resolution of Pleasant Grove drainage problems?

A-3-30

11. WASTEWATER TREATMENT

The NOP mentions that new urban development will be required to use regional wastewater treatment facilities. The City is currently completing a master plan to address regional

A-3-31

treatment plant expansion. If the County is projecting that new County development areas will be serviced as part of the regional treatment, either the current study will be required to be amended or a new, comprehensive study conducted. The mechanism for providing sewer service to the new development areas must be identified and analyzed in the DEIR.

A-3-31

12. WATER SUPPLY

The initial study checklist indicated that the general plan update project would not substantially reduce the amount of water available for public water supplies. However, it would seem that development of four new towns would require a substantial amount of potable water. What are the new water sources and how will it be conveyed to these currently undeveloped areas. In addition, Roseville opposes the use of groundwater to serve urban development.

A-3-32

13. PUBLIC SERVICES AND FACILITIES

The EIR needs to generate information relating to the impacts on the facilities and services in Roseville under the various growth and policy option scenarios, and how these impacts will be mitigated. The initial study does not address provisions of police services at all. In addition, the EIR will need to discuss the increased demand for police services resulting from urban rather than rural types of development. (Typically, urban police services are far more extensive than "on-call" service provided by a rural sheriff's department).

Further the EIR, must discuss mechanisms for provision of basic life support, advanced life support, and fire suppression. What will be the level of support and response times for these services? Are there short term and long term impacts to existing fire service providers?

A-3-33

Impacts can be also be anticipated to City park & recreation, library, water, wastewater, solid waste, electric, roadway, transit and affordable housing programs, services and facilities. To adequately mitigate impacts to the City's adopted service levels, the new development areas must provide a level of service which, at a minimum, is equivalent to Roseville's.

14. BIKEWAY

Roseville is interested in promoting regional bikeways through the City and connecting adjacent communities. As such, the City is currently preparing a bikeway master plan that includes regional connections to adjacent jurisdictions.

A-3-34

Placer County should consider inclusion of a regional trail system as part of this project. This would facilitate development of a regional bikeway system.

The Roseville 2010 General Plan supports this policy direction. Open Space policy number 3 states, "Work with adjacent jurisdictions to connect the City with regional open space and trail systems, providing a network of open space and habitat resources, pathways and, where reasonable, equestrian trails, through the City to link nearby communities."

A-3-34

15. WATER QUALITY IN ROSEVILLE

The General Plan update should address maintenance and enhancement of water quality in urban runoff. Urban runoff from southeast Placer County enters Roseville's natural drainages and has the potential to affect water quality in Roseville.

A-3-35

16. AGRICULTURE

The County has implied that the new town would be placed on low value farm land. This stance must be documented with an objective farm land evaluation program, such as the Land Evaluation and Site Assessment (LESA) program. The National Farmland Trust can provide additional information on this method and other methods of ranking farmland. Suitability of farmland for conversion should be assessed using a number of ranking factors, including timing of and alternatives to farmland conversion, parcel size, soil types, surrounding land uses, access to roads, and access to other infrastructure.

A-3-36

17. PROJECT OBJECTIVES

The project objectives listed are extremely general. They do not identify a time period for the General Plan (2010, 2040), nor do they identify a targeted population by year which serves as a planning tool. Is it the County's intent to accommodate all growth projected within the Placer County area within unincorporated areas. Is this growth market driven or will the County apply other criteria by which development entitlements will be granted? Is it an objective to minimize impacts to existing residents and Cities, and that new development not create an adverse fiscal impact?

A-3-37

Further, what entitlements of discretionary actions by the County are anticipated resulting from this project? Will the General Plan update only provide policy direction for future community and specific plans, or will land use entitlements be granted? How will this EIR relate to land use approvals

required in the new development areas? Will subsequent land use entitlements and environmental review be required?

Without more specificity in the project objectives, it is impossible to comment on the adequacy of the proposed project alternatives. There is no basis for analyzing the adequacy of proposed alternatives to determine, as required by the CEQA Guidelines, if they will "feasibly attain the basic objectives of the project..." (CEQA Guidelines, Section 15126).

A-3-37

18. ALTERNATIVES

The identified project alternatives appear to accommodate all of the same level of development and there is no reference to a projected planning horizon (2010, 2040, etc.). Other than the "No Project" alternative, it is not clear that the other alternatives have been formulated with the goal of substantially lessening or avoiding significant impacts caused by the proposed project.

A-3-38

Without more clearly defined objectives and more information regarding the rationale for the proposed project alternatives that will be analyzed, the County runs the risk of not meeting CEQA requirements in the DEIR. This could require a recirculation of this section of the DEIR and a delay in the completion of the General Plan update beyond the projected schedule.

19. CUMULATIVE ANALYSIS

For purposes of the DEIR, the cumulative analysis needs to include development applications currently on file with the City for urban reserve areas and sphere areas, as well as those projects reasonably foreseeable in Rocklin, Locmis, and Lincoln.

A-3-39

20. FUTURE STUDIES

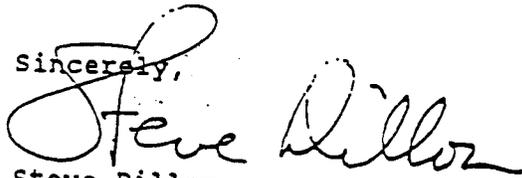
Consistent with recent court decisions, the DEIR should not rely on future studies to analyze the environmental impacts of the proposed project. To the degree that this is not feasible, the EIR should require that no new land use entitlements, development agreements, etc. be granted until the studies are provided and subsequent environmental review conducted.

A-3-40

Thank you for the opportunity to provide comments on this project. Should you have questions regarding these comments, please call me at 774-5499. In addition, please call me if I can assist your staff or consultants in identifying and directing questions to

appropriate City staff for follow-up questions during the preparation of the DEIR.

Sincerely,



Steve Dillon  
Community Development Director

cc: Al Johnson, City Manager  
Patty Dunn, Planning Director  
Neila Stewart, Environmental Coordinator  
Roseville City Council



COMMUNITY DEVELOPMENT  
**CITY OF ROSEVILLE**  
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ATTACHMENT # 2

318 VERNON STREET, #102 • ROSEVILLE, CA 95678  
PHONE: (916) 774-5334

March 11, 1993

Loren Clark  
Placer County Planning Department  
11414 B Avenue  
Auburn, CA 95603

A-3-41  
↓

**SUBJECT: COMMENTS ON PLACER COUNTY GENERAL PLAN BACKGROUND REPORT**

Dear Loren:

Thank you for the opportunity to comment on the Placer County Draft General Plan Background Report. This letter serves as a follow-up to our previous correspondence to the Board of Supervisors dated February 8, 1992, in which the City indicated that it would be providing detailed comments on the Background Report. A similar letter with comments on the Issues and Options Report is being forwarded under separate cover. The comments contained in this letter reflect a comprehensive review by all the Roseville Community Development Departments as well as the Police and Fire Departments.

DESCRIPTION

The Background Report has been prepared as the first major product of the Placer County General Plan Update. The Report has chapters concerning Land Use, Housing, Population, Economic Conditions and Fiscal Considerations, Transportation and Circulation, Public Facilities, Public Services, Recreational and Cultural Resources, Natural Resources, Safety, and Noise.

COMMENTS-GENERAL

1. Throughout the report, documents and legislation are referenced as draft or pending. The report should be updated to include the events which have occurred between 1991 and 1993. In Roseville, for example, the Roseville General Plan was adopted November 18, 1992. In January 1993, the City Council directed staff to move forward with a comprehensive land use allocation and a specific plan for the Del Webb Community. These significantly change the City's holding capacities, demand for public services, etc.

2. Placer County's policy in past years has been to encourage growth within the cities, especially as it is related to affordable housing. It appears from the various development proposals identified in the Land Use section, the County will be considering large scale development in unincorporated areas of Placer County. As a result of this possible policy change, the County General Plan and attendant documents should consider the following.
  - a. Job Growth in the unincorporated areas of Placer County should be balanced with provisions which enable and encourage the development of housing affordable to the workers filling the jobs.
  - b. The levels of public services to be provided in the new areas should be consistent with the service levels found in adjacent cities. As a result, the residents of the new areas will have access to adequate services, thus reducing potential impacts on the adjacent city.

#### Chapter 1: Land Use

<u>Page</u>	<u>Comment</u>
1-2	Plan Organization. As indicated in the Background Report, the "Placer County General Plan" is based upon four planning principles, one of which is that a "balance should be encouraged between jobs and labor force." In reviewing the Land Use section, no discussion is included regarding the existing ratio of jobs to employed residents and the projected ratio. This information is necessary as one factor in analyzing whether the amount of current and future residential and nonresidential acreage is adequate to provide a jobs and labor force balance.
1-5	The General Plan needs to include a detailed analysis of the actual implementation of financing public infrastructure within the county. The Background Report states that the primary constraint to development is the availability of financing for infrastructure. Has the county successfully implemented financing mechanisms within the newer community plan areas. What are the chances that future areas slated for development will be able to fund their own infrastructure? This is critical to inform the decision makers of the alternative growth scenario which will best serve all residents of Placer County.
1-6	The Background Report states that the "anticipated growth" adjacent to the Dry Creek plan will increase development pressure within the plan. Is the anticipated growth the new town? Does this mean the Dry Creek plan will be amended if Alternative 3 is adopted by the Board of Supervisors?

- 1-7 Please update this chart to correspond with the 1993 status of the Placer County community plans. Have the plans listed "Now Being Updated" in 1990 been completed?
- 1-20 What are the FAR's used to calculate the commercial and industrial square footages for each jurisdiction?
- 1-25 Table 1-10 shows the summary of land use category acreages for each city's general plan. Please see the attached land use table from the Roseville General Plan so that the Background Report may be updated.
- 1-26 & 27 The section on the Roseville General Plan should be rewritten to reflect the newly adopted General Plan and current comprehensive land use update process.
- 1-27 Was the Public Facilities plan for the Sunset Industrial Area ever completed?
- 1-27 The report states that the growth rate for Roseville exceeded 10 percent for a number of years. This should be clarified to say that the growth rate exceeded ten percent only in 1989.
- 1-32 Is the methodology for calculating holding capacity based upon written research or data from previous studies performed in Placer County?
- 1-33 What is the source for the persons per household rate of 2.69 people?
- 1-34 It should be noted that while Table 1-11 reflects the City's current General Plan holding capacity, the City is in the process of preparing a Comprehensive Land Use Element Update that would raise the holding capacity up to over 140,000 residents. This update includes development proposals within all of the City's urban reserve areas, within a portion of the north industrial area and within the Blue Oaks Village and Highlands (Cavitt Ranch) areas immediately adjacent to the City.
- 1-44 The background report states that the expansion of the Roseville sphere would not be consistent with the Agricultural Element. To convert such lands to urban use, the City must demonstrate a "clear and immediate need for development" Wouldn't this logic also apply to the proposed new town which would not be fully developed until well after 2010. Is the County going to amend the Agricultural Element to allow the new town but not to allow growth adjacent to existing incorporated cities. With so much land designated for development is there a

- "clear and immediate need" for additional land for urban uses where locally important agricultural land is now the designated use? The logic used in this section of the report is contradictory if applied to the proposed Alternative 3. The same rule of appropriateness should be applied to development whether it is a City or a County proposal. In discussing Roseville's Sphere of Influence, it should also be recognized that there are several "island" areas between Roseville and Sacramento County ranging in size from 375 to 132 acres which are within the City's sphere. Most of these areas have existing residential development or are proposed for such.
- 1-46 Table 1-1b should be updated to reflect that there are a total of 19,789 acres within Roseville's City limits plus an additional 4,630 acres within the City's sphere for a total of 24,419 acres. The listing of current and proposed uses should be expanded to include residential in recognition of the "island" areas. These numbers do not include the Blue Oaks Village and Highlands areas which the City is currently analyzing for annexation.
- 1-51 The 1993 status of the Placer County Air Quality Attainment Plan should be included.
- 1-53 The report should include a regional map to show Placer, Yolo, Yuba, Nevada, Sutter, and El Dorado Counties. The major transportation corridors should also be shown.
- 1-54 The final document should include the status of Route 102 and the Board of Supervisors position as requested in the *Issues and Options Report* and staff report for the February 9, 1993 Board hearing.
- 1-62 The Livoti and Annabelle areas are not mentioned in the Background Report. Shouldn't all county property be included in the comprehensive materials?. (See comment 1-44.)
- 1-63 The text notes that for the Blue Oaks Villages project: "preliminary information submitted with the project suggests that annexation to the City is not contemplated." The General Plan should note the Blue Oaks property owners have submitted an application to the City to be annexed into Roseville and are participating in the comprehensive land use update. A Similar request and analysis is occurring for the Highlands (Cavitt Ranch) property which is not mentioned in the report.

- 1-65 Please note that the City supports retaining industrial uses within the Sunset Area whether the property is annexed to the City or retained within Placer County jurisdiction.
- 1-73 Jobs/Housing Ratio. This section should be revised to note:
1. The definition in the Land Use section states a ratio of 1.0 indicates a jobs/housing balance. However, the ratio adopted by Placer County, Rocklin, Lincoln and Roseville in 1983 through their involvement in the South Placer Policy Commission indicates a jobs/housing balance is achieved when 60 percent of the work force can be housed in affordable housing within a six mile commute radius and 80 percent of the workers could be housed in affordable housing within an 8 mile commute radius. It seems that this adopted definition should be used in place of the one identified on page 1-73.
  2. The jobs/housing balance must also consider not only a numerical balance, but also include a match between the wages earned by workers filling the jobs and the affordability of the housing within the commute radius.
  3. The jobs/housing balance is as important as a jobs/labor force balance and should be included as one the basic planning principles upon which the General Plan is based.

## Chapter 2: Housing

<u>Page</u>	<u>Comment</u>
2-19	Overpayment. The element is using 1990 MSA income information which should be updated to the June 1992 Sacramento MSA income information release by HUD.
2-19	Measures of Housing Cost Overpayment. The calculation of overpayment for renters should include rent and utilities. This is the definition of Affordable Housing as identified in the Glossary, Page 2-82.
2-23	Table 2-22. The table does not identify Maidu Village, an 80 unit senior complex.
2-26	Senior Housing Complexes and Services of the Elderly. The first sentence should be revised to show a range of 50-80 units. Maidu Village has 80 units.

- 
- 2-31 Housing Needs of Disabled Persons. The apartment complexes noted as serving the disabled should include Maidu Village as it has units for the elderly/disabled.
- 2-33 Housing Needs of the Homeless. This entire section should be updated to reflect the fact that the Regional Homeless Program did not move forward and currently the Winter Shelter at the Roseville Armory is the only homeless shelter available in Placer County.
- 2-36 The third paragraph describing St. Vincent De Pauls' Homestart Program should be updated to reflect the lease of the Flamingo Hotel for the transitional housing program. The jobs-housing balance should also be consistent with the definition adopted by the South Placer Policy Committee.
- 2-39 The income information should be updated to June 1992's HUD data.
- 2-42 Jobs-Housing Balance. The jobs/housing balance should also consider the match between wages earned by the workers filling the jobs and the affordability of the housing. The jobs-housing balance should be consistent with the South Placer Policy Committee definition.
- 2-52 Non-Profit Housing Corporation. Project Go and Volunteers of America, two non-profit corporations which develop affordable housing, are active in Placer County and have constructed 144 affordable units, through November 1991.
- 2-77 The 12th bullet should identify 22 complexes if Maidu Village is included.
- 2-84 Community Redevelopment Agency. The element does not discuss Placer County's current efforts to create several Redevelopment Project Areas and identify affordable housing financing resources available from redevelopment.

Chapter 3: Population

- | <u>Page</u> | <u>Comment</u>  |
|-------------|---|
| 3-13        | Growth in Cities. This section should reflect the population changes currently being processed by the City of Roseville as part of its Comprehensive Land Use Element Update. See previous comments under the Land Use Section. |

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Chapter 4: Economic Conditions and Fiscal Considerations

<u>Page</u>	<u>Comment</u>
General	This section should discuss the impacts on the Placer County work force and businesses which will be affected by the closure of Mather Air Force Base, the Sacramento Army Depot and downsizing of operations at Aerojet and McClellan Air force Base. Available data indicates Placer County residents make up an identifiable percentage of the work force for these organizations.
4-3	Jobs and Employed Residents. The second paragraph should note current unemployment conditions resulting from the recession.
4-36	Public Assistance. This section should be revised to note: <ol style="list-style-type: none"><li>1. The City of Roseville Housing Authority manages a large Section 8 program than Placer county. The Roseville Housing Authority manages the Section 8 Program in the cities of Roseville and Rocklin.</li><li>2. The Roseville St. Vincent De Paul Society offers the only transitional housing program for families in Placer County. This program is partially funded by the City of Roseville.</li><li>3. A partnership of Placer County jurisdictions which include: Roseville, Rocklin, Lincoln, Auburn and Placer County provide financial and staffing support for the operation of the Winter Homeless Shelter in the Roseville National Guard Armory.</li></ol>
4-46	Schools. It is our understanding that the Roseville Elementary and Roseville Joint Union High School districts employ staff for their facility planning needs.

Chapter 5: Transportation and Circulation

<u>Page</u>	<u>Comment</u>
5-13	Local Transit Service. Clarification is needed regarding what is meant by "independent transit operators" in the first sentence.
5-14	Roseville Area Dial-A-Ride (RADAR) should be added under Placer County Transit as a service which PCT makes connections with. And, under "Roseville Urban Shuttle (RUSH)" the third sentence should read: One route has 30 minute headways, the other two are consist of looped routes; each loop on a 30 minute headway with a total 60 minute headway for the entire route. The fourth sentence

- should read: The three routes are "hubbed" at the Sierra Gardens Transfer Point and connect every 30 minutes at this location. Under "Roseville Area Dial-A-Ride (RADAR)" the percent of elderly and/or disabled is 75%.
- 5-15 Under "Consolidated Transportation Services Agency (CTSA)," the date which CTSA was incorporated should be given. The term in the last line of the first paragraph should be social service programs rather than how it now reads "social services".
- 5-16 First Paragraph - The Placer County Transportation Commission (PCTC) is not responsible for preparing Placer County's Short Range Transit Plan (SRTP). They assisted in that effort. The SRTP is a County plan not a PCTC plan. The last line in this paragraph should read: The City of Roseville has also developed a Short Range Transit Plan for its three systems. The last update of this plan was completed in fiscal year 1991/92. The City of Roseville has prepared a 20 year Long Range Master Transit Plan to guide the development of transit until the year 2010. The document should include an explanation of what the SRTP is and why jurisdictions prepare them.
- Second Paragraph - Sacramento should not be in parenthesis. The implementation schedule for the extension of light rail from Antelope Road to Roseville Parkway is 2010. It should be stressed that the City of Roseville and Sacramento Regional Transit are moving forward with the necessary planning and engineering work on this alignment. It should also be stressed that "interest remains high" for this project.
- 5-17 Under "Capital Corridor Intercity Rail", the fact that Caltrans is providing Amtrak bus connector service throughout the day from Roseville to Sacramento should be mentioned.
- 5-21 First Paragraph - The City of Roseville does have bikeway plans for its individual specific plan areas but does not have a Citywide Bikeway Master Plan. Roseville is currently working on the preparation of one. A draft plan is expected to be completed in early summer 1993.
- Under this section, some mention of the projects within Placer County using Prop. 116 funds should be mentioned. PCTC can provide a list and their descriptions.

- 
- 5-23 The last paragraph in this section is outdated information. Current information should be solicited from PCTC.
- 5-25 Under "Existing Programs" - When do all the Cities and the County have to have a TRO adopted by?
- 5-39 Under "Public Transportation" last paragraph - LTF goes to transit first then to streets and roads if, and only if, it is determined by the PCTC that no unmet transit needs exists. The existing sentence is misleading.
- 5-40 Under "Sale Tax Increase" - A majority vote is required of whom? The public or elected officials? Under "Fuel Tax Increase" - What type of vote is required? Majority? Under "Traffic Mitigation Fees" - The City of Roseville has been told that these funds CANNOT be used for transit. This may need to be researched.
- 5-43 Last bullet - This information is incorrect and should be updated given new circumstances. And, an additional bullet should be added which states the need for land use planning and transportation to be linked.

#### Chapter 6: Public Facilities

##### Water

- | <u>Page</u> | <u>Comment</u>  |
|-------------|---|
| 6-3         | Table 6-1 shows that Roseville has 2.7 million gallons of water storage - this should be 8 million gallons of storage.  |
| 6-6         | There is some discussion on basin-wide watershed surveys that need to be completed by the water purveyors to comply with the Safe Drinking Water Act. This is being completed for the American River Basin. There is participation by all major water agencies that receive their water supply from this basin. This study will try to establish Best Management Practices for the Basin. The drafter of the document should talk to the agencies involved to review pertinent information. |

Fig. 6-8 Figure 6-8 states for Area 1 - Roseville Area:

"Possible High Nitrate concentrations without implementation of community sewerage systems, if sewers are not made available, Placer County DEH recommends large parcels (in excess of 7 Acres), area modeled for potential nitrate build-up in Dry Creek/ West Plane Community Plan".

Please explain this statement in more detail and give exact locations where this is a problem. The reader may assume that the City of Roseville has a community sewerage problem. Table 6-8 is also vague. (This is explained in the wastewater section, but there should be some reference to this information.)

6-17 There is concern expressed about groundwater "overdrafting". The following statement is made: "As more stringent regulations are imposed upon water purveyors regarding surface water, considerable effort is underway to replace surface sources with groundwater sources." What plans are there to mitigate this problem and is there a County groundwater management plan that implements BMP's for groundwater usage?

Most of the groundwater used in Western Placer County is agriculturally related. This is not readily apparent from the text.

Wastewater

Page      Comment

General      Since the emphasis on wastewater systems is on on-site disposal (septic tanks), there should some discussion on where septic pumpers are going to discharge in the future, when development increases around the current drying lagoons. There is a brief statement that septage haulers discharge to "drying lagoons operated by the County, located at the Sunset Industrial Park.... The dried septage is then placed in the Western Regional Sanitary Landfill".

General      What plans for disposal are there and what type of cleaning frequency is planned? There is reference to a 2 to 10 year time frame for cleaning. The EPA suggests every 3 to 4 years. If there is a potential impact, as suggested, should there be a significant effort to educate the owners of proper operation and maintenance of these facilities?

General There is no discussion of treatment facilities and future requirements.

Solid Waste

<u>Page</u>	<u>Comment</u>
6-51	Analysis of Future Waste Streams. This section implies that waste disposed is total waste generated. The section should project total waste disposed. Some waste is currently burned and buried in franchise areas and not accounted for in the chapter.
6-51	(Last Paragraph) The City of Roseville Environmental Utilities Department provides collection of municipal solid waste - not the Department of Public Works.
6-51	Collection of Municipal Solid Waste. Roseville does not contract with private firms for hauling. Commercial and industrial accounts are serviced through municipal programs. Private haulers provide temporary services for construction.
6-52	Table 6-16 - The Berry Street Mall is owned and operated by Finger Estate. Fees are \$10.00/yard or \$30.00/ton as of 1990.
6-56	The Materials Recoveru Facility is necessary to meet a 25 percent waste stream by 1995 and 50 percent reduction by 2000. The facility will include a composting operation.
6-57	The Environmental Utilities Director does not believe Placer County is investigating RDF powers for meeting 50 percent diversion by 2000.
6-58	(Table 6-19) The Western Regional Sanitary Landfill Authority has revised its fee structure to \$20.00/ton and \$5.20/cubic yard.
6-63	Tires are currently shredded and buried at the WRSL.
6-64	The cost of curbside recycling may increase rates 25 percent but not meet AB939 mandates. As worded, it appears that curbside is a preferred method over the county supported MRF.
6-65	Composting is sized for 30 TPD.

- 6-71 Western Placer relies on surface water, not groundwater. Overdraft is most likely due to well fields in Sacramento County. Well water is used as emergency supply and supplement.
- 6-66 A fourth entity provides electrical service to Placer County residents, businesses, and industries - the City of Roseville Electric Department.
- 6-66 The following should be inserted:  
**City of Roseville Electric Department**  
The City of Roseville Electric Department is owned and regulated by the City. The Department serves customers in the area approximately the same as City boundaries. The Department now buys its electricity from the Northern California Power Agency and the Western Area Power Administration.
- 6-66 SMUD is a publicly owned energy utility regulated by the elected SMUD board. Within Placer County, SMUD currently provides electrical service to a 5 square mile area in the Dry Creek /West Placer Community Plan, west of the City of Roseville and other areas adjacent to the City. SMUD does not currently obtain electricity from the Northern California power Agency. Placer County should check with SMUD about this.
- Fig.  
6-21 All the references to "K.W." should be "kV".
- 6-69 The NCPA facility generates 49 megawatts of power and supplies electrical energy to the City of Roseville and other members of NCPA. (The NCPA plant is not a primary source of electrical energy for the City of Roseville.)

## Chapter 7: Public Services

### Section 7.2 Social Services

- 7-2 This section does not discuss the services provided by the county's Community Services Department which provides a range of housing and other social service assistance

Section 7.4 Law Enforcement

<u>Page</u>	<u>Comment</u>
7-3	The criminal justice system consists of many elements which the County provides. The draft report only addressed the Sheriff's Department and made no mention of: the Superior and Municipal Courts, the District attorney, the Probation Department, the Social Services Department or Mental Health. These offices of County Government have a profound impact on the quality of life for Roseville residents and should be evaluated with this report.
7-3	The report makes a very cursory review of the current level of services provided by the Sheriff's Department and makes no mention of the future. It is impossible to comment appropriately without more information.
7-3	The report states "The Sheriff is the only provider of jail services in the County; thus, city police departments must book all their arrests into the County's facilities." The Roseville Police Department has maintained a Type 1 Jail at its 401 Oak Street facility for 20 years and booked more than 3,000 prisoners last year.
7-3	The report does not address future expansion of County jail facilities into the South Placer County area. Currently, these facilities are located in Auburn and Lake Tahoe, leaving the bulk of the County population without readily available services. The present jail is located on Highway 49 and booking officers can easily spend more than one hour driving to and from this facility. The County should provide a jail facility in the South Placer area to serve the tax-paying population in this area.
7-3	There was no information provided regarding the proposed South County Service Center. This facility is proposed to house all County facilities in one location, conveniently located for the residents of Roseville, Rocklin, and Lincoln.
7-4	The report does not address policies and their impact on the population of the County. One example is the policy of not holding most arrests in custody. Following arrest, most are quickly released on citations. If they fail to appear, an arrest warrant is issued and they are then rearrested. This process can be repeated many times, at great expense to law enforcement agencies. Periodically, the Sheriff's Department and the Probation Department conduct "sweeps" to

incarcerate the same wrong-doers. This policy contributes to a lack of respect for our system of justice and does little to protect the public.

### Chapter 8: Recreational and Cultural Resources

<u>Page</u>	<u>Comment</u>
8-12	The report indicates that "the aggregate local park acreage estimated exceeds Placer County's parkland goals". It is important to recognize that just setting aside acreage is not adequate to meet recreation needs. Financing measures need to be implemented that assure that the set aside land is developed in a time frame that relates to adjacent development. To date, many of the County's identified park sites remain undeveloped, although adjacent residential areas are occupied. As a result, the cities continue to provide the main share of active recreational needs for County residents.
8-15	Placer County has made it clear in this document that they do not provide recreation services, therefore, other public agencies (i.e. Roseville) will be impacted by populations within the County seeking recreation programs. Some coordination is necessary and should be addressed in this document. The demand by county residents of municipal services may have a large impact on the City of Roseville Recreation program services. The county has no community centers or recreation program staff therefore the County residents must rely on neighboring municipal and special district jurisdictions for recreation services. Currently many of the participants in City recreation programs are residents of unincorporated areas of the County.

### Chapter 9: Natural Resources

*Note: The City has not comments on Air Quality. The section in the Placer County General Plan Background Report is almost identical to that included in the Roseville General Plan EIR, prepared by Jones and Stokes Associates and certified by the Roseville City Council in November 1992.*

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Drainage

Page      Comment

Fig. 9-1      Figure 9-1 depicts the major river watersheds, groundwater basins and flood hazard areas. The map should include drainage names.

Significant Natural Areas

Page      Comment

9-32      Table 9-10 identifies ten significant natural areas (SNAs), designated by the California Department of Fish and Game (CDFG), located in Placer County. Three are within the City of Roseville.

9-32      The first SNA is lower Miners Ravine which has been identified as the best example (relatively undisturbed condition) of a fall-run chinook salmon stream. Chinook salmon historically spawned in Miners Ravine but the current population has been planted by CDFG. Are there no other streams supporting natural (or planted) chinook spawning? Is this creek truly a special habitat because of the chinook spawning? We are interested in understanding the relative importance of this creek.

9-32      The second and third SNAs are classified as Roseville's eastern and northern vernal pool. They have been classified as two of the ten SNAs because they are considered "extremely rare". Are similar vernal pool habitat types of comparable quality found elsewhere in California? Could you please provide additional information supporting the rare identification? If these habitat types are extremely rare, the City and state and federal agencies must evaluate current preservation and development policies as the policies relate to the vernal pools.

Central Valley Habitat Joint Venture Program

Page      Comment

9-39      Page 9-39 states, "USFWS is considering acquiring a sizable area of Placer and Sutter Counties west of Lincoln and Highway 65 for part of a possible American Basin Open Space Preserve". Please provide more information on this preserve. Is it within Roseville's sphere of influence? How will it relate to Roseville and to the County's regional landfill?

Appendix 9-B

The following comments has been included for the benefit of the Placer County planners and for the purpose of accuracy within the County's General Plan. Several scientific plant names have been misspelled. The correct spellings are presented below:

- |   |                 |                                |
|---|-----------------|--------------------------------|
| o | popcorn flower  | <i>Plagiobothrys</i> sp.       |
| o | canyon live oak | <i>Quercus chrysolepis</i>     |
| o | Tanoak          | <i>Lithocarpus densiflorus</i> |

Chapter 10: Safety

<u>Page</u>	<u>Comment</u>
General	The flood hazard section does not reflect the extensive studies prepared by the City of Roseville and the Placer County Flood Control District. The consultant may wish to include the findings of the Cirby-Linda-Dry Creek Flood Control Project Reports as background materials in the flood hazard section. Additional studies, including the Dry Creek Study prepared by JM Montgomery Engineers for Placer County should be referenced and the findings should be included.

Chapter 11: Noise

*Note: The City of Roseville has no comments on the Noise Section of the Placer County General Plan Background Report. The information is extremeley similar to that contained in the Roseville General Plan EIR.*

Thank you for the opportunity to comment on the Placer County General Plan Background Report. If you have any questions about the comments included in this letter or would like copies of information referenced herein, please do not hesitate to call Julia Burrows at 774-5434 or Dan Dameron at 774-5276.

Sincerely,

Julia Burrows  
Administrative Analyst II  
Community Development Department

Dan Dameron  
Senior Planner  
Planning Department

↑  
A-3-41  
↓

ATTACHMENT # 3

M E M O R A N D U M

TO: Dan Dameron  
CC: Steve Dillon  
FROM: Neila Stewart  
DATE: October 14, 1993  
REGARDING: Comments on the Placer County General Plan DEIR

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This memo contains comments from the Community Development Department on the Placer County General Plan DEIR.

FULL BUILDOUT SCENARIO

1. According to Laurence Mintier, the consultant who prepared the DEIR (public workshop, October 7, 1993), the full buildout development scenario is not considered in this DEIR, because it is unrealistic when considered in the context of the existing and future land development market. It is the City's perspective that, although the General Plan considers land use in excess of market projections, the full impact of this land use combined with existing land use should be analyzed and disclosed.

A-3-42

CEQA requires analysis of the full buildout scenario because the General Plan effectively grants entitlements based on full buildout. By not considering the full buildout of the project, the DEIR is not considering all potential impacts as required by CEQA.

ALTERNATIVES

2. Page 10-1 of the DEIR states,

"The discussion of alternatives shall focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."

A-3-43

The DEIR does not seriously consider project alternatives to the new growth areas, as required by CEQA. Viable alternatives were eliminated from consideration, with no clear

analysis of environmental consequences or consequences to adjacent jurisdictions such as Roseville. Examples of viable alternatives include encouragement of growth within established urban areas, encouragement of growth along regional transportation corridors (such as I-80), or pursuit of development of a new regional transportation corridor, such as "Route 102", to support the new growth areas.

A-3-43

3. Section 21002 of the California Public Resources Code (PRC) forbids an agency from approving a project with significant adverse impacts when feasible alternatives or feasible mitigation measures can substantially lessen such impacts (Sierra Club v. Gilroy City Council; Citizens for Quality Growth v. City of Mount Shasta; Kings County Farm Bureau v. City of Hanford). (Remy, Thomas, and Moose, 1992<sup>1</sup>)

The "feasible alternatives" or "feasible mitigation" requirement is particularly relevant to the Placer County General Plan Update which identifies three new growth areas on the borders of Roseville. These new growth areas will result in significant adverse impacts to Roseville. An example includes traffic impacts which are identified in the DEIR. There are several feasible mitigation measures that could substantially reduce these impacts including the development of regional transportation links around Roseville to State Route 65 and Interstate 80. This mitigation (or alternative) is within unincorporated Placer County and its jurisdiction, and thus, should be considered (CEQA Guidelines, Section 15091).

A-3-44

4. The alternatives analyses did not address the specific resource issues discussed in the DEIR. Thus, the DEIR alternatives analysis should be expanded.

A-3-45

#### MITIGATION

5. Page 1-9 states,

"...this EIR identifies no additional feasible mitigation measures beyond those incorporated as General Plan policies and programs that would be available to mitigate the significant impacts of the Draft General Plan."

A-3-46

Unless the policies and programs are definitely part of the project description, the County is required to address significant impacts through mitigation, as feasible.

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<sup>1</sup>Most of the discussions of relevant court cases have been drawn directly from, "Guide to the California Environmental Quality Act (CEQA)", by Remy, Thomas, and Moose, 1992 edition.

As an example, measures suggested to provide sufficient potable water to the new growth areas must either be identified in the General Plan, or they must be adopted as mitigation measures. Otherwise, the new town projects may not be developable, for a lack of potable water.

This scenario of identifying potential solutions and referencing the general plan is a common occurrence throughout the document (especially in regard to infrastructure needed to serve the new growth areas.) This method of addressing potentially significant problems is insufficient because there is no guarantee measures will be accomplished and because there is no guarantee or analysis that some of the solutions are feasible (e.g., acquisition of sufficient water to serve agriculture in the year 2040).

A-3-46

6. The Placer County Environmental Review Ordinance (1990) states that:

"Draft monitoring plans for projects for which an EIR is prepared shall be included in the Draft EIR. The monitoring plan shall be subject to the same public review and comment accorded all other portions of the EIR."

The Draft EIR did not include a mitigation monitoring plan, pursuant to the County's Environmental Review Ordinance, most likely because mitigation measures were not included in the DEIR. However, the City of Roseville believes mitigation should be applied (as discussed in this letter). In addition, many impacts are identified as being mitigated through implementation of proposed General Plan policy. It is not clear in the General Plan how this implementation of policy will occur or how it will be monitored. This is because there is a lack of implementation measures in the General Plan and little linkage between the measures and policy. The mitigating General Plan policies and implementation measures, as well as any additional mitigation measures, should be included in a mitigation monitoring plan and circulated for review by interested agencies and individuals.

A-3-47

#### SHORT-TERM VERSUS LONG-TERM USES

7. The DEIR should specifically explain short-term uses and long-term impacts in the context of this project. The analysis must focus special attention on impacts that narrow the range of beneficial environmental uses or pose long-term risks to public health and safety. The discussion must also explain the reasons purportedly justifying going forward with the project in the present "rather than reserving an option for further alternatives". (Remy, Thomas, and Moose, 1992)

A-3-48

CUMULATIVE IMPACT ANALYSES

8. The DEIR did not include a list of projects for the cumulative analysis. According to decisions made for "Kings County Farm Bureau et al versus the City of Hanford" and "San Franciscans for Reasonable Growth versus City and County of San Francisco", cumulative impact analyses are legally deficient: (1) when they omit projects [from the cumulative list] that are "reasonable and practical" to include, and (2) when the analysis understates "the severity and significance of the cumulative impacts (Remy, Thomas, and Moose, 1992). The DEIR should include a cumulative project list, that includes development projects proposed for Roseville, Lincoln, Sutter County, Northern Sacramento County, and other projects in the South Placer Region. In addition, cumulative impact analyses should be provided for all resource issues.
9. The DEIR should discuss cumulative impacts when they are significant. When cumulative impacts are not significant, the DEIR should explain the basis for that conclusion. A proper cumulative impact analysis must occur before a project gains irreversible momentum (Remy, Thomas, and Moose, 1992; CEQA Guidelines, Section 15130; City of Antioch v. City Council).
10. Cumulative impacts were not addressed for all resource issues. For example, cumulative impact analyses were notably missing from infrastructure and service discussions. In Las Virgenes Homeowners Federation, Inc. v. County of Los Angeles the court stated,

A-3-49

A-3-50

"The purpose of this requirement is obvious; consideration of the effects of a project or projects as if no others existed would encourage the piecemeal approval of several projects that, taken together, could overwhelm the natural environmental and disastrously overburden the man-made infrastructure and vital community services. This would effectively defeat CEQA's mandate to review the actual effect of the projects upon the environment." (Remy, Thomas, and Moose, 1992)

A-3-51

This quote is very clear regarding the need to assess cumulative impacts to infrastructure and community services. The fact that certain project's cumulative impacts are uncertain does not relieve the lead agency from including such impacts in its analysis. (Remy, Thomas, and Moose, 1992)

As previously indicated, the DEIR must include a cumulative project list. The use of a "summary of projections contained in an adopted general plan" would not be appropriate because the County does not have a recently adopted general plan with

accurate projections. The cumulative impact analysis must include past, present, and reasonably anticipated future projects, including projects proposed for Roseville's urban reserve which are currently undergoing programmatic environmental review.

A-3-51

GROWTH

11. The DEIR does not address growth in a sufficient level of detail.

A-3-52

12. Page 1-6 states that one of the project objectives is to

"[p]rovide direction to guide growth in the County so that the grandchildren of current Placer County residents and their families' futures are protected. (The current General Plan appears to only accommodate expected growth for the next 40± years.)"

If the current general plan can accommodate sufficient growth through the year 2033±, as stated in the DEIR, then one would assume the four new growth areas need not develop until after the year 2033. If the new growth areas develop sooner it can reasonably be argued that they will promote inefficient "leap frog" development, a type of development which unnecessarily or prematurely extends into agricultural and open space land and results in large infrastructure costs. The impacts of this type of development should be addressed in the DEIR.

A-3-53

13. Page 2-8 of the DEIR states,

"the first housing units [will be] available for occupancy around the year 2000".

Given South Placer County currently has sufficient urban land uses for 40 years of growth, this premature conversion of agricultural land would result in leap frog development and urban sprawl. These items should be addressed in the DEIR.

A-3-54

14. Page 2-7 of the DEIR states,

"The 2010 employment scenario is a reasonable assumption, given land availability and the rate of employment growth evidenced in the late 1980s in the county, although it does imply adding more jobs per year (about 4,400 jobs on average) than was the case in all but one of the last 10 years ..."

A-3-55

It seems the 2010 employment scenario may be optimistic, given that it uses higher job accumulation rates than experienced in

the late 1980s when South Placer County experienced exceptionally strong economic growth. The DEIR should explain the basis for using these exceptionally high employment rates during a recessionary period for California.

A-3-55

#### PROJECT DESCRIPTION

15. The project description is insufficient in that it does not provide sufficient explanation or a map for the new growth areas. The only reference to new growth areas in the project description is one short paragraph. This has resulted in a project description that is misleading which is clearly inappropriate, pursuant to County of Inyo, supra:

"A curtailed or distorted project description may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental costs, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the 'no project' alternative) and weigh other alternatives in the balance." (Remy, Thomas, and Moose, 1992)

A-3-56

The DEIR should provide more information on new growth areas in the project description. The City is aware that land use diagrams exist for all of the proposed new growth areas, but have not been included in the DEIR. In addition, the County should consider recirculating the DEIR with a complete project description so that readers may fully evaluate the completeness of the impact analysis.

#### PROJECT OBJECTIVES

16. Page 1-6 describes the project objectives laid out by the Placer County Board of Supervisors. The new growth areas are not consistent with objectives 2, 3, and 4.

Objective 2 states,

"...new growth must ...minimize adverse impacts on the existing quality of life in the county."

A-3-57

The new growth areas will substantially impact existing quality of life in the County and the cities. This is an inappropriate result of the project, given objective 2 and given this quality of life impact can be avoided or significantly reduced by eliminating the new growth area proposals.

Objective 3 states,

"Protect agricultural lands."

The new growth areas are inconsistent with this objective. The project could be consistent with this objective if a different alternative were pursued -- one in which the new growth areas were eliminated from the project description and development were directed to already-urbanized areas having sufficient capacity to accommodate new development. The proposed project would result in the "direct conversion of 5 percent and the potential for conversion of an additional 16 percent of the total farmland in the county by 2010" (page 1-10 of the DEIR). Additional farmland would be converted by the year 2040.

This does not accomplish objective 3, since it is an impact that can be avoided or significantly reduced.

Objective 4 states,

"Balance growth by separating and individualizing population centers."

A-3-57

The proposed new growth areas are inconsistent with this objective, because sufficiently large buffer zones have not been included in the project description. As an example, no sufficient buffering has been identified between the Stanford Ranch West project and the City of Roseville. This growth area is immediately adjacent to areas with existing industrial land use in the City. The General Plan is not clear as to what may or may not occur in the buffer zones, and it appears that large lot residential development may be permitted. Allowing such development within buffer zones would be inconsistent with objective 4 and would result in sprawl.

In addition, objective 5 states,

"The Countywide General Plan should, therefore, include a population cap of 500,000."

This is a "dependent" statement but no supporting evidence has been provided as to why the County's population cap should be 500,000.

#### LAND USE ISSUES

17. Page 3-4 of the DEIR states that the general plan policies will ensure new industrial development "minimizes its impacts on adjoining land uses". It is not clear how this will be done.

A-3-58

18. It is not clear how close Sunset industrial land uses will be to Stanford Ranch West residential land uses. How close will the Stanford Ranch West residential land uses be to existing industrial land use within the City of Roseville?

The heavy industrial uses are not compatible with the residential uses proposed for the new growth area. Odor (from the landfill and other industrial uses), noise, and air quality impacts can extend over a long distance. A buffer separating the residential uses from the industrial uses would have to be large enough to substantially reduce these negative externalities. It is not clear from the DEIR if adequate buffering has been provided.

A-3-59

19. Page 3-6 of the DEIR: The land use impact analysis addresses only one type of impact -- conversion of land. The DEIR should also address plan consistency (for the new growth areas), land use compatibility (for the new growth areas including their relationship to cities, landfill sites, etc.), and change in quality of life.

A-3-60

20. Page 1-9 of the DEIR: The DEIR states that the project has the potential to substantially alter the existing or planned land use where significant new growth areas are designated (e.g., adjacent to the City of Roseville). The document identifies this as a "potentially significant adverse impact". This impact should be labeled significant and unavoidable, as it is clearly both, if the new growth areas develop.

A-3-61

21. Table 3-1 on page 3-2 states that the new growth areas will include a minimum of 2,838 acres of open space. It is not clear if this include land slated for golf courses, developed parks, ranchettes, or other semi-urban uses. If so, the DEIR should clarify that this figure does not represent open space in the traditional sense of the phrase.

A-3-62

22. Buffer zones should be large enough to address the following issues:

- o industrial noise and odor in residential areas
- o sufficient distance between heavy industrial properties using toxic chemicals and residential land uses to protect public safety in the event of an accidental chemical spill,
- o glare in rural residential areas
- o residential neighborhood concerned about overspray of biocide applications
- o residential neighbors subject to constant odors from a landfill or a wastewater treatment plant
- o sufficient room for the landfill to expand and still maintain a large buffer
- o truck noise in residential neighborhoods

A-3-63

Many of these are problems currently experienced in Placer County that have resulted from the placement of incompatible uses too close to each other. This situation should not be exacerbated by placing residential land uses adjacent to industrial and other noncompatible uses such as those which exist or could develop in the Sunset Industrial Plan Area or Roseville's North Industrial Area. A clear analysis of adequate buffer zones should be included in the DEIR.

A-3-63

#### HOUSING ISSUES

23. Page 3-5 of the DEIR: South Placer County is already "out of balance" with regard to jobs-housing. The areas supports more housing than employment opportunities. The new plans advocate development of more residential development as compared to job-producing land uses. For example, the Stanford Ranch West new growth area would replace land currently zoned for industrial with residential land uses. This situation is not consistent with General Plan policies designed to balance jobs and housing. How did the DEIR come to the conclusion that jobs and housing would move closer to balancing?

A-3-64

24. The Housing Element was adopted prior to consideration of the DEIR. The DEIR states that policies will be used to mitigate pre-considered impacts. Will the County change the Housing Element if additional significant impacts show that additional policies or mitigation measures are necessary?

A-3-65

25. Page 3-8 of the DEIR, policy A.8 states,

"The County shall establish a public housing authority serving the Placer County area."

A-3-66

It is not clear when this will be accomplished, or how it will be monitored (i.e., in the sense of mitigation monitoring).

26. Page 3-8 of the DEIR, policy A.9 states,

"The County shall support the creation of a nonprofit housing development corporation..."

A-3-67

It is not clear when and how this be accomplished.

27. Page 3-8 of the DEIR, policy A.11 states,

"All new housing projects of 100 or more units on land that has received an increase in allowable density ...shall be required to provide at least 10 percent of the units to be affordable to low income households."

A-3-68

The policy is unclear. Does this refer to 10 percent of the

density increase (i.e., total units) or 10 percent of the original density, pursuant to normal zoning densities? How will the units be guaranteed affordable? Will a deed of trust be used?

A-3-68

Page 3-9 (policy A.12) discusses use of a 1 percent fee for construction of affordable housing. It is not clear how this program will be administered. More information should be provided on implementation.

A-3-69

Page 3-9 (policy A.17) states the County shall encourage...production of affordable housing. It is not clear how the County will "encourage".

A-3-70

Page 3-10 (policy A.23) states the Supervisors may waive fees for affordable housing. It is not clear who will subsidize the services that would have been paid for by the fees. How will the waiver of fees impact the burden on market rate units?

A-3-71

#### FISCAL IMPACTS

28. Page 6-5 of the DEIR includes cost estimates for a number of municipal facilities. However, the most significant costs -- those associated with roadway improvements, water distribution, and wastewater management -- have not been addressed. The DEIR should provide a range of cost estimates for all required municipal facilities.

A-3-72

29. What are the fiscal impacts of the new growth areas? It would not appear that residential development could pay for all new infrastructure (e.g., water treatment plant, wastewater treatment facility, transmission lines). Will the County provide revenue to subsidize residential public services? What will be the resulting "break-even" point for the residential units? How will this impact their ability to compete in the market with residential units that can be constructed within the existing cities? How might that impact the absorption projections included in the DEIR?

A-3-73

#### GENERAL INFRASTRUCTURE COMMENT

30. Page 3-3 of the DEIR states that the residential land use policies include policies to ensure:

"new residential development occurs where adequate services are available".

A-3-74

The proposed project is not consistent with this policy statement. The new growth areas would place residential development far from any County infrastructure (water, sewer, libraries, parks, etc.). The project could be consistent with

this policy if it did not include development of new growth areas. In the year 2010 it is projected that 25% of the new development will have occurred. The DEIR should analyze if this level of development will be adequate to fund all the necessary infrastructure and services at urban levels.

A-3-74

31. Page 7-3 of the DEIR states,

"The Cities of Roseville, Rocklin, Loomis, and Lincoln and other communities provide local neighborhood and community park sites."

It is not clear how the new growth areas impact Roseville public services and facilities, including libraries, parks, recreation, senior activities, police, fire, etc. Will the County provide all these services at the same levels as provided by the City for new growth areas to reduce impacts to Roseville's services? The City of Roseville has current documentation that many people outside of Roseville use Roseville's libraries and park & recreation programs. The proposed new growth areas will impact these City services and programs for which the DEIR needs to identify adequate mitigation.

A-3-75

#### GROUNDWATER AND DRAINAGE

32. Page 5-45 states,

"The cities of Rocklin, Lincoln, and Roseville, along with the Stanford Ranch West, Placer Villages, and Bickford Ranch new growth areas, are within these [water] sheds, and all call for significant development. These sheds will undoubtedly experience significant increases in runoff volume generated from the anticipated development."

Page 5-44 of the DEIR states,

"...increase in runoff will be insignificant for all of the sheds in Placer County with the exceptions of the Dry Creek and Cross Canal watersheds."

A-3-76

It is not clear what areas (e.g., Rio Linda, Roseville, etc.) will experience the runoff burden. What land uses (e.g., residential) will experience flooding as a result of this runoff? The DEIR should address in more detail the potential flood impacts downstream, and the potential for backwater flooding impacts to Roseville.

33. Page 9-8 states impacts from flooding would be significant if they would,

"Increase populations in areas subject to inundation..." [example, the area north of Dry Creek and west of Roseville] or

"increase flood risk as a result of increased surface drainage..." [example, Sutter County].

Page 5-52 states,

"Based on the policies ..., in combination with implementation of other flood improvement plans, the impacts of the Draft Land Use Diagram can be mitigated to less-than-significant levels."

A-3-77

Page 9-10 of the DEIR states,

"There are no significant adverse flooding, surface drainage, or dam inundation impacts resulting from the General Plan."

It is not clear if additional runoff from the County upstream of Roseville cumulatively contribute to significant flood impacts currently experienced in some residential portions of Roseville? How will the policies reduce impacts to less-than-significant levels? How can the City be assured that new development will result in no net increase in runoff? The only assurance the City currently has is a policy calling for no net increase and an annual review of the policies. This is insufficient.

34. Regular use of groundwater wells should not be permitted as part of the new town developments. This could result in significant depletion of groundwater resources. The DEIR states that groundwater may be used. A more in depth analysis of this issue needs to be included in the DEIR.

A-3-78

#### WATER QUALITY

35. Page 8-5 of the DEIR states,

"New urban development could result in substantial reduction in water quality of local groundwater resources by increasing the number of separate septic tank systems."

Page 8-5 of the DEIR states,

"Development within the county through 2040

A-3-79

would continue to contribute to reduced groundwater quality in Placer County."

Page 8-6 of the DEIR states,

"There are no impacts of the General Plan which are not mitigated through the Draft Policy Document" [regarding both surface and ground water quality].

A-3-79

The claim of no impact to ground and surface water quality is not substantiated in the DEIR. Additional support material explaining why water quality impacts will be less than significant should be included.

36. Page 8-6 of the DEIR states,

"This cumulative water quality impact from development in the three counties and incorporated cities would be experienced in all downstream surface waters in these watersheds, including waters flowing into Sutter and Sacramento Counties ..."

A-3-80

It is not clear if this cumulative impact is significant and unavoidable. How will this impact be mitigated?

WASTEWATER

37. Page 5-21 of the DEIR provides a general list of impacts associated with community wastewater systems. The DEIR should provide more detailed information on these impacts and on the feasibility of wastewater treatment.

A-3-81

38. The DEIR does not address the County's ability to discharge wastewater to surface receiving waters. The DEIR should address surface discharge requirements for wastewater in the Dry Creek and Pleasant Grove Creek basins. The new growth areas may not be able to meet surface discharge requirements for temperature, pH, suspended solids, salts, metals, and other constituents of wastewater. General assessment of these requirements is necessary in this DEIR.

A-3-82

39. What Roseville drainages will be receiving wastewater from Placer County? To what level will this wastewater be treated?

A-3-83

40. Page 5-37 of the DEIR states,

"Impacts from wastewater ... are expected to be identified..."

A-3-84

It is not clear what is meant by "expected to be identified".

The DEIR should identify any impacts that are currently expected.

A-3-84

41. Page 5-39 of the DEIR states,

"Since the Roseville Regional WWTP is expected to manage extensive volumes of wastewater ..., the regional plant, or another community facility is the logical choice to manage expected increases in wastewater generated as a result of growth."

A-3-85

The City is preparing a wastewater treatment master plan which includes expansion of the service area in Placer County. This master plan addresses demand over the next 20 years. However, this master plan does not include the County's four new growth areas. The City is not planning to provide wastewater treatment for the new growth areas at this time.

#### WATER SERVICE

42. It is not clear how this project affects agricultural production at full buildout, given the following quotes from the DEIR.

Page 5-12: "PCWA and NID do not, however, have sufficient water rights to serve the agriculture irrigation demands (in combination with the rest of western Placer county's irrigation demands) at holding capacity."

A-3-86

Page 5-13: "PCWA does not, however, have sufficient water rights to serve the agriculture irrigation demands."

43. Page 5-13 of the DEIR states,

"The City of Roseville could provide water service to this project with substantial improvements to treatment facilities, transmission lines, pressure control devices, and storage facilities."

A-3-87

Page 5-11 of the DEIR states,

"It appears that PCWA will supply the treated surface water (to the Dry Creek plan area) on a temporary basis through the Roseville Water Treatment Plant..."

Page 5-14 of the DEIR states,

"Placer County Water Agency anticipates serving this area through the City of Roseville's treatment and transmission system, first on a temporary basis utilizing extra capacity in the Roseville system, then by up-sizing the City's system to accommodate this project."

A-3-87

Roseville does not have sufficient transmission capacity nor treatment capacity to serve the new growth areas. The City also does not have sufficient transmission corridor capacity to service the new growth areas. Thus, this project would require a new transmission corridor. Has the County considered the impacts of a new transmission corridor traversing Roseville and Placer County? The DEIR should address this issue.

44. Page 5-15 of the DEIR states,

"Facilities necessary to service existing water customers and anticipated growth can be constructed as necessary; therefore, the impact of the General Plan on the agencies water supply and distribution systems would be less than significant."

The DEIR claims potable water impacts are less than significant, even though it is unclear:

- o if sufficient water contracts are available,
- o who will provide infrastructure,
- o who will provide water treatment, and
- o if ground water resources will be used.

A-3-88

The DEIR quotation listed above indicates future water sources are uncertain.

In the Kings County Farm Bureau et al. v. City of Hanford, the court determined that the EIR was inadequate for two reasons: 1) the EIR relied on a mitigation agreement with a water district; and 2) because the record contained no evidence indicating whether water was, or would be, available for purchase.

The Placer County General Plan DEIR uses similar reasoning in the analysis of water supply impacts. The DEIR should provide more specific information on water supply.

45. The DEIR should provide formal mitigation measures to alleviate water supply impacts.

A-3-89

46. Page 5-15 of the DEIR states,

"These policies and programs require that new development occur only when there is a demonstrated long-term reliable water supply..."

A-3-90

The proposed new growth areas are not consistent with this Placer County General Plan policy statement. The DEIR should assess policy consistency for all the new growth areas and all resource issues, including water supply.

47. Table 5-1 (page 5-5 of the DEIR) states current total demand at 17,307 acre-feet and partial buildout demand at 516,149 acre-feet. This last figure seems exceptionally high. The accuracy of the figures in this table should be confirmed.

A-3-91

48. Page 5-12 states,

"These [PCWA and SJSWD water treatment] plants must be up-sized or replaced by a larger plant, or a combination of these measures, to meet the estimated future demands."

A-3-92

Potable water is required to service growth areas, and yet, the DEIR and the General Plan do not include mitigation measures to ensure potable water will be available. The DEIR must not ignore significant impacts -- impacts so serious they preclude project construction. These issues must be addressed in full and mitigation must be provided.

#### SOLID WASTE INFRASTRUCTURE

Page 5-55 of the DEIR states,

"With successful implementation of General Plan policies, the solid waste impacts of the General Plan are less-than-significant."

This statement has not been substantiated. The DEIR should provide more explanation. Does the buffer around the landfill include additional space for future expansion? How close will residential land uses be placed to the land fill (in the Stanford Ranch West new growth area? With the proposed project, by what year would the WRS� be at capacity? How many years of capacity would the County (and Roseville) lose from landfill with implementation of this proposed project (including the four new growth areas)?

A-3-93

AGRICULTURAL ISSUES

49. Page 8-9 of the DEIR states,

"Development under the General Plan Land Use Diagram could also result in the potential conversion of an additional 32,210 acres of farmland in the county by 2010."

The new town projects are inconsistent with the goals and policies of the rest of the general plan, because these urban growth areas are not needed to accommodate growth over the next 40 years. As a result, new town development will result in the premature conversion of agricultural land. This should be addressed in the DEIR. The DEIR should also address policy consistency with regard to this issue and all other resource issues.

A-3-94

50. Agricultural policies outlined on page 8-12 state,

"These policies provide for protection of areas designated for agriculture, encourage continued and increased agricultural activities on appropriate areas...."

The DEIR should reflect that the new growth areas are inconsistent with the new policies for agricultural preservation.

A-3-95

51. Page 8-12 of the DEIR states,

"There are no General Plan policies that would mitigate for the loss of prime farmland to a less-than-significant level.."

The DEIR should consider and clearly identify alternatives to new town development which could avoid or significantly reduce these impacts.

A-3-96

BIOLOGICAL ISSUES

52. Table 8-7 provides an outline of species protected by the federal government. This table is misleading because it does not include the numerous species protected by state government. A DEIR normally includes both state and federal lists. Please add a table of state-listed, special-status species, including Swainson's hawk, which has been observed foraging in the vicinity of the new growth areas north and west of Roseville.

A-3-97

53. The DEIR should address the cumulative impacts to the Swainson's hawk.

A-3-98

54. Page 8-27: The DEIR should include an estimate of impacts to sensitive habitat types, including vernal pools and other Corps-jurisdictional wetlands.

Page 8-31 states,

"These policies and programs protect wetland communities and related riparian areas, including requiring new development to fully mitigated wetland loss to "no net loss.""

A-3-99

It is not clear how the new growth areas will accomplish this policy. Can the new growth areas accomplish this policy better than the other alternatives considered in the Issues and Options Report? This type of comparative alternatives analysis should be used for all significant impacts identified in the DEIR.

55. Page 8-34 of the DEIR states no additional mitigation measures are feasible to address habitat conversion in new growth areas. The DEIR should analyze alternative sites. The main purpose of examining alternative sites is to alleviate significant impacts.

A-3-100

56. The DEIR should analyze if new growth areas result in significant unavoidable impacts to oak and riparian woodlands as a result of utility transmission crossings, road crossings, bridges, golf courses, parks, etc.?

A-3-101

#### VISUAL IMPACTS

57. The South Placer new growth areas would result in significant unavoidable visual impacts as a result of the loss of open space (and specifically natural vegetation) in a rural community. The DEIR should address this issue.

A-3-102

#### CULTURAL RESOURCES

58. The DEIR (page 7-10) identifies potentially-significant impacts to unknown cultural resources. The DEIR also states,

"No feasible mitigation measures beyond the policies and programs... are available that would reduce the possibility of occasional accidental disruption of important archaeological, historic, or paleontological sites to a less-than-significant level."

A-3-103

The DEIR also states that only:

"18 percent of the county has been field surveyed" (page 7-8).

The proposed new growth areas could be field surveyed, or at least those areas with the greatest potential for presence of cultural resources (e.g., drainages). The DEIR should include mitigation to this effect.

A-3-103

#### CIRCULATION

59. Page 1-10 of the DEIR states,

"There are, therefore, no feasible mitigation measures that the County can undertake to reduce this impact [traffic congestion in Roseville] to a less-than-significant level."

The City disagrees with this conclusion. The DEIR has not considered development of other regional transportation routes to bypass Roseville, such as a "Route 102". If the County included regional transportation routes linked to S.R. 65 and I-80, traffic impacts to Roseville could be substantially lessened. The DEIR needs to include mitigation for this impact. In addition, representatives from the County should meet with representatives from Roseville to discuss possible mitigation. To date, no coordination between the County and the City on the proposed new transportation routes and mitigation identified in the project DEIR has occurred.

A-3-104

60. Page 4-39 of the DEIR states,

"Under the 2010 Mitigated Transportation System, level of service "F" conditions on I-80 in Placer County for an average weekday peak hour would be limited to the Roseville area."

The DEIR has identified some mitigation measures to address this issue; however, the measures have no funding, and are thus, unlikely to be constructed. How would the impact change if unfunded mitigation were not constructed and if it was measured at the 2040 development scenario (or at a full buildout scenario)?

A-3-105

61. Page 4-39 of the DEIR states,

"There are no funding sources for a number of the roadway capacity improvements included in the 2010 Mitigated Transportation System..." (table 4-21).

All necessary roadway improvements should be funded by the developments requiring the roads. No new development should be allowed without sufficient congestion mitigation that is fully funded. The impacts of the cost of funding these

A-3-106

improvements should be analyzed.

A-3-106

62. The County has identified Foothills Boulevard as a principal arterial extending to Lincoln. The City is not in favor of this designation, nor is the City in favor of extending Foothills Boulevard into Placer County at this time. The traffic analysis for the General Plan DEIR should be modified to reflect this situation.

A-3-107

63. Page 4-41 of the DEIR states,

"Additional east-west roadway capacity in West Placer County would be needed to link the proposed new growth areas with Sutter County and Sacramento County ... Preservation of right-of-way for potential extensions such as Pleasant Grove Boulevard, Blue Oaks Boulevard, and Sunset Boulevard is proposed to accommodate long-term growth in West Placer County."

A-3-108

The document specifically states that additional east-west roadway capacity is critical to development of the new growth areas. The DEIR should not assume use of Roseville Roads for important east-west regional transportation corridors. The DEIR must consider new east-west regional connectors around Roseville in order to protect the quality of life for Roseville citizens.

64. The DEIR (page 4-41) states,

"A north-south connector between Lincoln and Rocklin on the east side of Route 65 is shown to accommodate short-distance travel..."

A-3-109

Has this road been included in the most recent update to the Rocklin circulation element? The most recent version reviewed by the City of Roseville did not depict this roadway. How will this roadway interface with Roseville and Rocklin roads?

65. Table 4-24 shows eight Roseville roads operating at level of service (LOS) F as a result of the County's four new growth areas. It also presents possible road expansions to partially mitigate the impacts. However, the expansions would result in severe impacts to Roseville residents, possibly calling for the removal residential units. These possible roadway expansions are unrealistic (e. g., eight lanes on Cirby Way) and therefore cannot be considered feasible mitigation. The DEIR, though, needs to analyze what the LOS's would be without these unrealistic roadway improvements in place, and what other mitigation exists to eliminate impacts to Roseville.

A-3-110

Finally, the EIR mischaracterizes Cirby Way from Riverside to Oakridge as a six lane road (EIR, 4-7), and fails to mention adverse impacts to Main Street.

EXCERPT FROM TABLE 4-24

2040 ROADWAYS NOT MEETING LEVEL OF SERVICE STANDARDS  
UNDER 2040 BASE TRANSPORTATION SYSTEM

ROADWAYS OPERATING AT LOS F				
Roadway	Limits	Lanes		
		1990	2040 Base System	2040 Needs
Note: These figures do not consider full buildout of the proposed new growth areas.				
Foothills Blvd	Vineyard Rd to Cirby Way	4	6	8
Cirby Way	Foothills Blvd to Riverside Ave	4	6	8
Riverside Ave	Douglas Blvd to Darling Way Cirby Way to I-80	2 6	2 6	4 8
Sunrise Avenue	Sacramento County to Douglas Boulevard	4	6	8
Washington Blvd	Route 65 to Industrial Blvd Junction Blvd to Oak St	2 2	4 4	6 6
Blue Oaks Blvd	Route 65 to Foothills Blvd	4	6	8
Pleasant Grove Blvd	Washington Blvd to Foothills Blvd	0	6	8
Roseville Pkwy	Harding Blvd to Pleasant Grove Blvd	0	6	8

A-3-110

AIR QUALITY

66. Page 8-35 of the DEIR states,

"Stationary source air emissions are not included in the emission estimates."

A-3-111

Stationary sources are expected to be a higher percent of total emissions in the future. Stationary source emissions should be included in the DEIR analysis.

A-3-111

67. Transportation control measures in the Air Quality Attainment Plan should be incorporated by reference in the DEIR as mitigation for the project.

A-3-112

#### NOISE

68. The DEIR does not address noise impacts to Roseville residential areas that will be subjected to significant levels of traffic congestion as a result of the proposed project (e.g., Foothills Boulevard). The DEIR should address, in more detail, noise impacts to Roseville's residential receptors.

A-3-113

69. The thresholds of significance for noise (page 9-11) should include exceedence of City of Roseville noise standards since Roseville's sensitive residential receptors will receive the brunt of the traffic noise.

A-3-114

70. The DEIR should provide noise contour maps and data (see Table 9-2) for roads in Roseville that would be significantly impacted by traffic from the new growth areas (e.g., Foothills Boulevard).

A-3-115

71. Page 9-18 identifies policies that will mitigate traffic noise levels to sensitive residential receptors. How will this be accomplished in portions of Roseville that are built out and where no space remains for buffers, as suggested in the policies?

A-3-116

72. Page 9-19 identifies traffic noise as "significant and unmitigatable". However, alternatives to the new growth areas could mitigate or significantly reduce this impact.

A-3-117

#### PROJECT SUMMARY

73. The "summary" section of the EIR lacks the information required by CEQA Guidelines §15123. It does not list each significant effect, and it is very difficult to tell how various impacts are mitigated. There is no discussion of how growth in Roseville, both approved and proposed, will affect the analysis.

A-3-118

#### NOP COMMENT LETTER

74. The City prepared a comment letter for the DEIR Notice of Preparation (see attached letter). The City is hereby incorporating the NOP comment letter into this letter. Please respond in writing to the comments presented in the NOP comment letter.

A-3-119

MEMO

TO: Dan Dameron  
 FROM: John Sprague  
 DATE: October 14, 1993  
 SUBJECT: Comments on the 10/1/93 Draft Placer County General Plan and Environmental Impact Report (EIR)

I have reviewed both the draft Placer County General Plan and EIR from the perspective of Housing, Economic Development and Economic Analysis. My comments on the Housing and Economic Development sections are listed below. I am trying to obtain a copy of the Economic Analysis referenced in the EIR. My comments related to the Economic Analysis will follow later.

I. COMMENTS ON THE DRAFT PLACER COUNTY GENERAL PLAN:

A. New Growth Areas

1. Policy 1.L.2, Page 41,

The policy should include an objective directly related to the provision of housing affordable to all income groups in the new growth areas.

A-3-120

B. Jobs-Housing Balance

1. On 1/15/93 I provided the following comments to the Jobs/Housing Balance: Jobs/Housing Ratio section of the 9/25/93 draft Placer County General Plan Background Report, Volume I. The current draft General Plan does not seem to address these comments:

a. The definition in the Land Use section states a ratio of 1.0 indicates a jobs/housing balance. However, the ratio adopted by Placer County, Rocklin, Lincoln and Roseville in 1983, through their involvement in the South Placer Policy committee, indicates a jobs/housing balance is achieved when 60% of the work force can be housed in affordable housing within a six mile commute radius and 80% of the workers could be housed in affordable housing within an 8 mile commute radius. It seems this adopted definition should be used in place of the one identified on page 1-73.

A-3-121

b. The jobs/housing balance must also consider not only a numerical balance, but also include

a match between the wages earned by workers filling the jobs and the affordability of the housing within the commute radius.

A-3-121

2. Goal 1.M, Page 42,

- a. The Jobs/Housing Goal appears establish a conflict between the existing urban areas and the new growth areas. Policy 1.M.2. states that new large residential development in existing communities with jobs-housing imbalances will be timed to occur simultaneously with development providing primary wage-earner jobs. However, given the substantial over supply of nonresidential land which will be available if the new growth areas are approved the existing urban areas will be competing with the new growth areas for these same primary wage-earner jobs.

A-3-122

The Jobs/Housing Balance Goal should include additional policies which guide development creating primary wage-earner jobs into the existing urban areas, before the new growth areas are considered. In this manner the existing jobs/housing imbalances can be addressed.

3. Economic Development

- a. Policies 1.N.12 and 1.N.13,

These policies state the County shall retain the undeveloped industrially zoned land in the unincorporated area for future use. However, the Stanford Ranch West Specific Plan is located in a portion of the Sunset Industrial Area. The Economic Development Policies should be modified to reflect the County's willingness to consider changing some vacant industrial land to residential uses.

A-3-123

4. Part III: Specific Development Standards for New Growth Areas

- a. The development standards for the new growth areas should specifically include the requirement to provide a wide range of housing types affordable to all income groups.

A-3-124

II. Comment on Draft Placer County General Plan EIR:

- A. 2.5 Scenarios for Growth and Development, Page 2-5

1. Table 2-4, Page 2-7, projects Placer County's population growth increment at 139,504 persons for the period of 1990/1991-2010 and employment growth increment at 90,100 jobs during the same period. The 12/16/92 Roseville Market Analysis prepared by Recht Housrath & Assoc. (RHA) projects Roseville's population to grow by 59,600 persons and employment to grow by 24,500 job between 1990/1991-2010. Based on these projections Roseville will account for 43% of the county wide population growth and 30% of the county wide job growth during the 1990/1991-2010 period. A-3-125
2. Distribution of Growth within Placer County, Page 2-8, assumes three of the new growth areas, Placer Villages, Stanford Ranch West and Villages of Dry Creek will have one-quarter of their residential units built out by 2010. These three areas directly abut or are within a one mile proximity of the Roseville's boundary. According to Table 3-1, Page 3-2, 38,170 units/ 94% of all units proposed for the new growth areas are allocated to these three areas. Using this EIR's assumption that 25% of these units will be built out by 2010 results in a total of 9,542 units to be built on Roseville's periphery by 2010. These units represent 35% of the residential units RHA's Roseville Market Analysis estimates will be needed in the Roseville area from 1990-2010. A-3-126
3. Distribution of Growth within Placer County, Page 2-8 assumes the three new growth areas will have 20% of their nonresidential sites built out by 2010. Using this assumption approximately 3.5 million square feet of nonresidential development will occur in the new growth areas by 2010. This development represents 32% of the estimated 11 million square feet of nonresidential development needed in the Roseville area as identified by the RHA Roseville Market Analysis. A-3-127
4. Population and Employment Growth Totals for Placer County, Page 2-7 assumes the County will add on average 4,400 more jobs per year than was the case in all but one of the last 10 years. The EIR recognizes this is an aggressive growth rate for through 2010. A-3-128
5. CONCLUSION:
  - a. The estimated residential and nonresidential demand numbers contained in the RHA Roseville Market Analysis were based on the assumption the new growth areas would not produce a A-3-129

significant amount of residential or nonresidential development prior to 2010. The EIR projections that the new growth areas surrounding Roseville will produce 9,542 units and approximately 3.5 million square feet of nonresidential development will have a significant impact on the City of Roseville, which has not been adequately addressed by the EIR. At a minimum the EIR needs to analyze the fiscal ability of the new growth areas to provide the levels of service required by the draft General Plan ie: library, recreation, schools ect. If the plan areas are only 25% build out by 2010 will there be sufficient revenues to provide an adequate level of services or will the residents rely on Roseville, which is the closest area offering these services, to meet their service needs

- b. The RHA Roseville Market Analysis projects that if the City of Roseville extends land use entitlement into the City's Urban Reserve Areas there will be a 48% supply margin for residential units and a supply margin of 106%-546% among nonresidential land uses. Supply margins of this magnitude should raise the question of the need or advisability for allocating additional land use in rural/agricultural or industrial areas directly adjacent to Roseville.
- c. Use of the assumption the County will add 4,400 more jobs per year through 2010 than it achieved during the past 10 years is a strong indication the area will have to experience extremely strong growth in order to need the land use provided by the new growth areas. The growth assumptions used in the EIR do not appear reasonable given the projections included in the RHA Market Analysis prepared for Roseville. The EIR should reconsider the growth assumptions and determine whether the land use represented by the new growth areas will be needed prior to 2010. If this additional land use is not needed by the county prior to 2010 in order to plan for reasonably projected growth demands considerations of these areas should be postponed until the next General Plan update.

A-3-129

B. Balance & Economic Development, Page 3-5

- 1. The comments I made in sections 2.a. and 3.a. of the General Plan heading of this memo apply to

A-3-130

these same sections of the EIR.

A-3-130

C. Affordable Housing, Page 3-8

1. This section of the EIR reviews the various policies contained in the County's Housing Element which will be used to promote the development of affordable housing. It appears policies A.11 and A.13, Inclusionary Zoning policies and policy A.23, a fee waiver policy, will require the expenditure of substantial County and developer funds. The EIR does not appear to consider the fiscal impacts to the County or developers to provide these funds. Generally the cost for the inclusionary programs are passed on to market rate units which will affect the ability to build and successfully market these units.

A-3-131

MEMO

DATE: OCTOBER 12, 1993  
TO: PATTY DUNN, DIRECTOR, PLANNING  
FROM: MIKE SHELLITO, DIRECTOR, PARKS AND RECREATION  
SUBJECT: PLACER COUNTY GENERAL PLAN DRAFT REVIEW and  
DRAFT EIR REVIEW

General Plan Draft Review:

1. Policy 5.A.15 clearly indicates the county will not become involved in the operation of organized, activity oriented recreation programs, especially where a local park or recreation district has been established. This policy is of great concern to the Parks and Recreation Department. This policy clearly indicates that the county expects surrounding cities and other districts to provide recreation programs and services for county residents.

The City of Roseville's recreation programs and facilities have been planned with city residents in mind. The City of Roseville park dedication requirement of 9 acres per thousand residents provides park land for Roseville residents only.

Additional population centers that would result from "new towns" developing on Roseville's borders without a provision for recreation programs and service delivery would greatly impact the City of Roseville. Potential impacts would be:

1) Increased demand for programs and services offered by the City Parks and Recreation Department from County residents. Currently the City has approximately 30% of non-residents who participate in our recreation programs. This percentage would be expected to increase with the development of unincorporated "new towns" on the City's borders.

2) Increased use of City parks and facilities by County residents and corresponding increases in costs associated with maintenance of these parks and facilities. Maintenance of City parks and facilities is funded through the general fund. These costs would be increased by the additional use from county residents on the City's borders.

3) The establishment of more stringent policies to give City residents priority to participate in City sponsored programs and facility use. Additionally, the City would have to greatly increase non resident fees surcharges to offset expenses associated with serving County residents. Both of these policies cause public relations and administrative problems on the part of City residents and non residents.

A-3-132

SUGGESTED MITIGATION:

a) Require that development of populations centers on Roseville's borders either include the establishment of a Recreation and Parks Department within an incorporated City or the establishment of a Recreation and Park District or Community Services District to provide for the delivery of recreation programs and services to any unincorporated areas.

A-3-132

2) In Policy 5.A.2 regarding the park facility standards. While most of the standards listed meet or exceed nationally recognized standards for park facilities, two items do not meet NRPA standards. These standards are taken from Recreation, Park and Open Space Standards and Guidelines by the National Recreation and Park Association.

These discrepancies are:

c. 1 tennis court per 6,000 residents.

The recommended standard is 1 tennis court per 2,000 residents.

d. 1 basketball court per 6,000 residents.

The recommended standard is 1 basketball court per 5,000 residents.

A-3-133

Because the County's development standards do not meet national standards, it is reasonable to assume that county residents may look to adjacent cities and districts to make up for the County's deficiency. This may cause increase demand for these specific facilities in adjacent communities.

SUGGESTED MITIGATION:

1) The County shall meet all NRPA park facility standards by increasing the ratios outlined above.

Draft EIR Review:

1) In Chapter 7, Recreational and Cultural Resources, there is no specific mention of the archaeological resources in Roseville. However, resources are referred to generally in the overall area.

A-3-134

2) Why is Roseville not included in Chapter 8, Natural Resources, wherever there is mention of community plan areas?

A-3-135

MEMORANDUM

Date: October 6, 1993  
From: Chief Tom Simms *TS*  
To: Patty Dunn, Planning Director  
Subject: REVIEW OF PLACER COUNTY DRAFT DOCUMENTS

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OCT 07 1993

PLANNING DEPARTMENT

The draft General Plan and Environmental Reports had very little information dealing directly with the issue of law enforcement services. It was difficult to review the documents and gain any insight into the projected "new growth areas." Specifically, we looked for: a description of the law enforcement related problems brought to this area by development; a description of the impact of these law enforcement related problems on the rest of the county; and, proposed mitigations to these impacts.

We were unable with the limited time available to find any mention of the impact of this growth on the District Attorney, the Probation Department, or the county jail facilities. It can be safely assumed that these resources, which are relied upon heavily by existing county residents, would be negatively impacted by this new growth.

The reports did not address the issue that the vast majority of county resources are concentrated in Auburn, despite the fact that 70% of the county population resides in the South Placer Area. With these "new growth areas" it is anticipated that this problem will get even more pronounced.

Some of our specific comments are:

General Plan:

1. Foothills Boulevard and Blue Oaks Boulevard in Roseville is designated as an "arterial" for "new growth areas." (Figure I-8)
2. With the exception of response times, the law enforcement policies (Goal 4.H) does not identify the dramatic differences found between law enforcement services provided in highly urbanized areas versus those found in rural areas. People who live in "cities" have much higher service level expectations when compared to those living in rural settings. The goals provide for longer delays to emergency law enforcement calls for service than fire calls. Are rapes in progress less critical than brushfires?

A-3-136

A-3-137

A-3-138

Environmental Impact Report:

1. Chapter 6 "County Facilities and Services" describes needed facilities, but does not describe services. Nor does it address the facilities needed by the courts, probation, corrections of District Attorney.

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A-3-139  
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MEMORANDUM

TO: Dan Dameron, Senior Planner  
FROM: Sue Nickerson, Library Director  
SUBJECT: Placer County General Plan Update  
DATE: October 8, 1993

I've reviewed the Draft EIR and the Draft Policy Document. The Draft EIR appears to forecast the need for county library facilities and services adequately; at least, new facilities and expanded services are included in the tables of countywide facilities in section 6.3. The problem of funding library facilities is addressed in 6.4.

However the Draft Policy Document does not include a section on county library service. Section 4 of the Policy Document covers all public facilities and services EXCEPT Auburn-Placer County Library. There are no goal statements, policies, or implementation programs for county library service.

Library facilities are mentioned in a few places in the Policy Document, most prominently in Part III, Specific Development Standards for New Growth Areas. The four specific plans include a library as one of the public facilities to be included in the Town Center. Other mentions of libraries are incidental.

This implies that the county will provide library service to the "new towns", but without goals and policies on libraries, the county has made no commitment to providing libraries. There aren't even any population targets or service standards to trigger the construction of new libraries, so Roseville, Lincoln, and existing county branches may be expected to handle all library service in this part of the county.

This isn't the first time that this has happened. When the Dry Creek/West Placer Community Plan was issued, it made no mention of library service, and I commented on this at the time. It now appears that the county has deliberately excluded library-specific goals, policies, and implementation programs from the General Plan Update Draft Policy Document.

A-3-140

MEMORANDUM

TO: Dan Dameron, Senior Planner  
FROM: John Maguire, Senior Civil Engineer  
DATE: October 13, 1993  
SUBJECT: Placer Co. General Plan Draft E.I.R.

Mr. Dameron, the following are my comments on the Transportation and Circulation Chapter of the subject E.I.R.

Circulation Plan Diagram: This diagram shows the extension of several existing city streets to unincorporated areas of the County. These streets include Pleasant Grove Blvd., Blue Oaks Blvd. and Foothills Blvd. Currently, the City's General Plan and Capital Improvement Program does not propose extension of these roadways beyond the existing City limits. However, extending these roadways will result in an overall increase in traffic on the City's roadways. This will degrade the level of service beyond acceptable levels on many City streets, yet no mitigation has been proposed to address these impacts. As a minimum, feasible mitigation measures should be proposed and analyzed including the construction of an alternative major east-west roadway to serve regional traffic that would bypass the City, and the elimination of any future extensions of and connections to existing city streets.

A-3-141

Table 4-3, Page 4-9: Under Roseville, this Table should include proposed improvements to the Sunrise Ave./Douglas Blvd. intersection and adjacent interchange at I-80. Also, a separate category should be provided for the Highway 65 Joint Powers Agency, and under this category new interchanges or improvements to existing interchanges should be indicated at State Highway 65 and Blue Oaks Blvd., Sunset Blvd. and Pleasant Grove Blvd.

A-3-142

Table 4-4, Page 4-10: Several roadways are listed under Roseville which are not yet approved roadways within the City (per the City's General Plan Circulation Diagram). If these roadways are eventually approved, a funding source for their construction will be identified, as with all new roadways within the City. Therefore, these roadways should be removed from this list.

A-3-143

Table 4-17, Page 4-21: This table establishes levels of service for roadways based on roadway link volume. For urban conditions, intersection levels of service are typically more critical than levels of service for roadway links. Therefore, conditions at intersections should be used to determine LOS's of roadways and proposed improvements within and adjacent to existing and proposed urban areas.

A-3-144

Table 4-18, Page 4-27: This table indicates that Foothills Blvd. north of the Roseville City Limits exists as 2 lanes. This is incorrect. This roadway does not exist north of the City.

A-3-145

Table 4-18, Page 4-29: Under Foothills Blvd., "Carlsberg Drive" should be replaced with "Pleasant Grove Blvd."

A-3-146

Table 4-18, Page 4-31: Under Junction Blvd., delete "Woodcreek Oaks Blvd. to Fiddymment Rd." This roadway currently is not shown on the City's General Plan Circulation Diagram and is not part of the City's Capital Improvement Program.

A-3-147

Page 4-39, First Paragraph following Mitigation Measures: This paragraph states that mitigation measures are not proposed for roadways outside of Placer County jurisdiction. However, traffic from proposed developments in the unincorporated areas of the County will cause a degradation of the level of service of many roadways within the City of Roseville. Therefore, this document should address these impacts and propose mitigation.

A-3-148

Table 4-20, Page 4-43: The City's Capital Improvement Program for roadways proposes improvements which will maintain a minimum level of service C throughout the City (with the exception of the intersection of Sunrise Blvd. and Cirby Way which is projected to operate at LOS D with planned improvements). However, this table indicates that with the development proposed in the County's proposed General Plan the LOS of many roadways within the City of Roseville will degrade to an unacceptable level even assuming the City's planned improvements at year 2010. Mitigation measures should be proposed to address this degradation in LOS.

A-3-149

Table 4-24, Pages 4-47 and 4-48: This table proposes improvements to several streets within the City to mitigate impacts from future development at year 2040. However, many of the proposed improvements are not feasible. For example, Riverside Ave. from Douglas Blvd. to Darling Way is proposed to be widened from 2 lanes to 4 lanes, and Cirby Way from Foothills Blvd. to Riverside Ave. is proposed to be widened from 4 lanes to 6 lanes. Due to physical constraints from existing development, these widenings are not feasible. Alternative feasible mitigation should be proposed and analyzed including the elimination of future extensions of and connections to city streets.

A-3-150

cc:

Larry Pagel  
Clara Lawson

MEMORANDUM

TO: DAN DAMERON, SENIOR PLANNER  
FROM: DAVID SMITH, SENIOR CIVIL ENGINEER *DS*  
SUBJECT: REVIEW OF PLACER COUNTY GENERAL PLAN UPDATE  
DATE: October 13, 1993

Our staff has performed a preliminary review of Section 5.3, Drainage, of the above document. We have the following comments:

Table 5-12, *Required Regional Storage*, underestimates the impervious area increase projected to occur between 1990 and 2040. Neither the Dry Creek nor the Cross Canal flood control plans included any of the new growth areas in their analysis of the storage required to mitigate the impacts of development. If the General Plan Update shows that the impervious area increase in these watersheds is less than the planned value, then either:

A-3-151

- a) Existing entitlements granted by current general plans have decreased (not likely), or
- b) Impervious area created by the new growth areas has been neglected, or both.

Table 5-10, *Impervious Surfaces 2040*, shows that new growth areas in the Dry Creek and Cross Canal watersheds will increase the impervious area by 1,266 and 2,544 acres, respectively. These increases are in addition to the planned increases of 5,171 and 14,950 acres, respectively.

A-3-152

Using ratios of storage required per impervious area increase contained in the Dry Creek and Cross Canal flood control plans, an additional 434 and 613 acre-feet of storage, respectively, must be provided to mitigate the impacts of new growth areas. These storage volumes are in addition to the 1,774 and 3,600 acre-feet already recommended by the respective flood control plans. Therefore, the new growth areas will require additional storage volumes of 24 and 17 percent above the amounts already recommended by the respective flood control plans. The additional storage volumes will have capital costs of at least \$1.2 million and \$5.4 million, respectively, based on unit costs per acre-foot used in the flood control plans.

A-3-153

At the present time, there is no funding mechanism in place for the Cross Canal Flood Control Plan within the unincorporated area of Placer County and the cities of Auburn and Rocklin.

A-3-154

cc: Larry Pagel, Public Works Director/City Engineer

MEMORANDUM

TO: Dan Dameron, Senior Planner  
FROM: Heidi L. Keith, Administrative Analyst *HK*  
CC: Larry Pagel, Public Works Director  
DATE: October 12, 1993  
SUBJECT: Placer County General Plan Update Comments

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After reviewing the Transit section of the Draft Placer County General Plan Update I have prepared the following comments:

1. Page 4-3 - When referring to public transit the term operator should be plural to refer to the several operators of public transit in the County.
2. Page 4-3 - Second from the last sentence: How will the feeder bus service for a light rail system that has no secured funding be able to also provide some additional intra-county transit service?
3. Page 4-52 - Third paragraph - PCTC is not the responsible agency for preparing Short Range Transit Plans (SRTP). Each transit operation in the County receiving State funds is responsible for preparing a SRTP. The Placer County Transit (PCT) SRTP does not represent all the transit operations within the County. There is no such document for countywide transit. Unmet transit needs analysis is not the true function of the SRTP. The unmet transit needs analysis is a separate function and process which is handled by PCTC as part of the allocation of Transportation Development Act monies.

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A-3-156  
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A-3-157  
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The "Roseville Commuter" needs to be added to the list of systems included in the City of Roseville's SRTP.

The last sentence in this paragraph should have "an outcome of" deleted.

PLACER CO. GP UPDATE COMMENTS  
PAGE 2

4. Page 4-52 - Last paragraph - The City is currently under contract with Sacramento Regional Transit to prepare Preliminary Engineering and an EIR for the light rail extension from Antelope Road to Roseville Parkway at a cost of \$450,000.

A-3-158

5. Page 4-53 - First paragraph - The document refers to Proposition 116 monies for the capital cost of rail transportation services. This funding source is no longer available, all of the \$35 million has been spent on rail projects in California. The document leads the reader to believe that this money is available for Placer County which is not true.

A-3-159

Interest also remains high for the extension of light rail.

6. Page 4-53 - Second paragraph - "in Placer County" needs to be added to the last sentence.

A-3-160

7. Page 4-53 - Fifth paragraph - The need for additional funding sources for transit capital and operations needs to be mentioned in this paragraph.

A-3-161

8. Page 4-53 - Sixth paragraph - "The" needs to be added before "level of transit funding".

A-3-162

Last sentence: "automobile, ... a reference to the fact that if increases in transit funding and additional transit services are not forthcoming this statement will be true.

**GENERAL COMMENTS:**

Overall the document is lacking in substance which makes it very difficult to evaluate. The document raises several issues regarding the projects impact on the provision of transit services throughout the County, but it does not address any of these issues and how they may be mitigated. It does not provide any alternatives which may create less of an impact or avoid an impact altogether. I do not believe the document is adequate in this respect.

A-3-163

MEMORANDUM

TO: Dan Dameron, Senior Planner

FROM: Jeannie Gandler, Admin. Analyst II/TSM Coordinator 

DATE: October 12, 1993

SUBJECT: Draft Environmental Impact Report - Placer County Countywide General Plan

This memo is to provide you with my comments regarding Chapter 4, "Transportation and Circulation", and specifically Sections 4.4, 4.5, and 4.6, Transit, TSM, and Non-Motorized Transportation respectively, in the Draft EIR for the Placer County Countywide General Plan.

The General Plan Policy Response in Section 4.4 - Transit, does not provide any real solutions to the lack of commuter oriented transit in Placer County. Studies are not enough, there must be tangible implementation measures that will provide a solution to the problem. It appears that there will be significant impacts, and that additional mitigation measures should be identified.

A-3-164

The General Plan Policy Response in Section 4.5 - Transportation Systems Management, lacks any real substance. This section simply describes existing programs, and relies on them to mitigate the effects of growth. However, TRO programs can only be as successful as the parameters within which they are set up. The current Placer County TRO does not have any ramifications for non-compliance, and it only affects employers of 100 or more, of which there aren't many in the unincorporated areas of the County. Furthermore, employers in the South Placer region who are currently complying with TRO's are frustrated by the lack of an "infrastructure" that supports their efforts, such as a comprehensive countywide bikeway system and/or commuter oriented transit services. Additional mitigation measures are needed to promote the use of alternative transportation, such as a more stringent County TRO. More importantly, the Draft General Plan policies should address the real problems, and provide tangible implementation measures, (other than monitoring TRO programs). Additional mitigation measures should be identified, since growth that is not accompanied by significant participation in TRO programs will have significant impacts.

A-3-165

Section 4.5's "Analysis of 2040 Conditions" states that "The County's Trip Reduction Ordinance should be reviewed and updated to reflect the new technologies." If the new technologies this section is referring to are clean air vehicles, then perhaps we can assume better air quality, however, single occupant vehicles will still cause major congestions problems, unless alternative transportation programs, (i.e. commuter

A-3-166

transit services, bikeways) are continually expanded and improved with all new growth.

Section 4.6 discusses "Non-motorized Transportation", and states that specific funding for bikeways has been allocated by the Placer County Transportation Commission by dedicating two percent of Transportation Development Act funds for bicycle and pedestrian projects. While this is a true statement, this funding source will not be sufficient for the improvements that are required to provide a comprehensive countywide bikeway system. Last year's total allocation to Placer County, excluding the Tahoe Basin, only totalled \$81,826. Considering that one mile of Class I (off-street) bikeway costs approximately \$150,000, it is obvious that some other funding mechanisms for developing a regional bikeway system must be identified. At the very least the deficiencies in the current bikeway system must be addressed, and solutions identified. The Draft General Plan Policies should address the lack of staff and funding that is hindering the implementation of a comprehensive bikeway system.

Overall, these sections of the Draft Placer County Countywide General Plan lack substance. The document should do more than describe existing conditions. It should address more specifically the impacts caused by the growth that would result from the land uses that are being proposed, and should describe implementation measures and new and innovative mitigation measures.

A-3-166

A-3-167

A-3-168

MEMORANDUM

TO: PATTY DUNN, PLANNING DIRECTOR

FROM: MAL TOY, ENVIRONMENTAL UTILITIES DIRECTOR *SMT /cs*

DATE: October 12, 1993

SUBJECT: EUD COMMENTS - PLACER COUNTY GENERAL PLAN UPDATE: DRAFT POLICY DOCUMENT AND DRAFT ENVIRONMENTAL IMPACT REPORT (OCTOBER 1, 1993)

DRAFT POLICY UPDATE

WATER SUPPLY AND DELIVERY

PG 66 POLICY 4.C.3

The County shall...delete "encourage"... add "require"...  
 - water purveyors to require that all new water services be metered.

A-3-169

PG 66 POLICY 4.C.2 a.

Urban and suburban development ...delete"should"...add "require"... - rely on public water systems using surface supply

A-3-170

SEWAGE COLLECTION, TREATMENT AND DISPOSAL

PG 68 POLICY 4.D.3

Reword to clarify what circumstances are being addressed. Current wording can infer that regional wastewater system establishment could be prohibited.

A-3-171

LANDFILLS, TRANSFER STATIONS, AND SOLID WASTE RECYCLING

PG 72 POLICY 4.G.1

Clarify existing Policy. "The County shall require waste collection in all new urban and suburban development to require mandatory collection of residential development."

A-3-172

PG 73 POLICY 4.G.6

Specify specific buffer distances for landfills and transfer stations. Clarify what is incompatible development.

A-3-173

PG 74

Add Implementation Program 4.20. "The County shall assist in the development of regional material recycling facilities to address the waste diversion needs of the County."

A-3-174

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DRAFT EIR

5.1 PUBLIC AND PRIVATE WATER SYSTEMS

GENERAL COMMENT:

There are many Development Areas that the county is addressing that do not have a direct source of water (PCWA or Roseville). Infrastructure being planned, constructed, and currently being used, have not been designed for these additional demands. Roseville cannot, except at exorbitant cost, provide large volumes of water to the west.

A-3-175

PG 5-11 DRY CREEK

Delete sentence "It appears that PCWA will supply the treated surface water on a temporary basis through the Roseville Water Treatment Plant utilizing excess treatment capacity in the plant." The Roseville Water Treatment Plant does not have year-around excess treatment capacity for use by Dry Creek. Excess treatment capacity is currently limited to the winter months for possible regional conjunctive use.

A-3-176

PG 5-13 PLACER VILLAGES SPECIFIC PLAN

Add to second paragraph. The final draft, dated August 20, 1993, of the City of Roseville General Plan Update Water System Study does not consider the City of Roseville providing water service to this project.

A-3-177

PG 5-14 VILLAGES OF DRY CREEK SPECIFIC PLAN AREA

First paragraph: Delete last sentence, first paragraph "At this time, PCWA anticipates serving this area through the City of Roseville's treatment and transmission system, first on a temporary basis indicating extra capacity in the Roseville system, then by upsizing the City system to accommodate this project". The City of Roseville water system does not have the extra capacity to temporarily service this project, nor does the current draft City of Roseville General Plan Update Water Supply Study (dated August 30, 1993) consider upsizing the City system to accommodate this project.

A-3-178

Paragraph two should be a general comment for all outlying areas not considered in the City of Roseville General Plan Update - Water System Study (Final draft dated August 30, 1993)

PG 5-15 SUMMARY OF IMPACTS (STANFORD RANCH WEST SPECIFIC PLAN)

Agriculture irrigation demand... could increase if a reliable surface ... add "or reclaimed" water source was provided.

A-3-179

PG 5-16

Modify last sentence to "... the impact of the General Plan on the agencies' water supply and distribution systems would be less than significant" to "would be significant". Insufficient documentation in the draft EIR to evaluate the impacts of the enormous expansion of the PCWA Treatment and distribution system to meet the water needs.

A-3-180

5.1 COMMUNITY AND INDIVIDUAL WASTEWATER

GENERAL COMMENT:

Placer Villages, Villages of Dry Creek, Bickford Ranch Specific Plan and portions of Stanford Ranch West Community Plans are not currently being considered in the Roseville Regional Wastewater Treatment Service Area Master Plan development. The assumption that these Community Plans could use the Master Plan's regional facilities has not been thoroughly discussed or other options evaluated.

A-3-181

PG 5-24 TABLE 5-7 Wastewater Generation Estimates.

The wastewater flow generation figures for Loomis Town, Newcastle, Granite Bay, Lincoln City, Rocklin City, Roseville City and Sunset should be consistent with similar data in the Roseville Regional Wastewater Treatment Service Area Master Plan.

A-3-182

PG 5-42 IMPACTS:

The conclusion that the impacts of Draft Land Use Diagram, associated with the public and private water systems can be mitigated to less than significant levels lacks sufficient supporting documentation to support that claim. Based upon the lack of information concerning the needed major wastewater collection and treatment facilities required, a "significant impact" finding should be rendered.

A-3-183

5.4 SOLID WASTE

PG 5-54 TABLE 5-13 SOLID WASTE GENERATION

Roseville Waste Disposal for 1990 is not 51,372 tons as stated in Table 5-13, but is 65,434 tons as stated in the City's 1990 draft SRRE. The SREE based figure includes all residential, commercial, industrial and construction demolition waste. Table 5-13 should be verified against equal respective jurisdiction's SRRE.

A-3-184

PG 5-53 IMPLICATIONS OF THE GENERAL PLAN LAND USE DIAGRAM

It is unclear what the projected impacts of increased population are on the Western Regional Landfill.

A-3-185

Additional discussion must be added to identify total waste generated by the County, and disposal in the County via the Eastern and Western Regional Landfill. A more thorough discussion of the General Plan's recycled materials generation and required Material Recovery Facility locations and capacity are required to support the DEIR conclusions. A more thorough discussion, supported by additional data, is required to support the DEIR claimed impact on the ERL and WRS� closure dates.

A-3-185

**PG 5-55 IMPACTS**

DEIR conclusion of "With successful implementation of General Plan policy the solid waste impacts of the General Plan are less than significant" cannot be substantiated without a more thorough discussion of solid waste collection and transportation to the MRF/landfill facilities for compliance with AB 939 and impacts to the existing ERL and WRS�. Based upon the existing limited discussion in the DEIR, the solid waste impacts of the General Plan should be deemed "significant".

A-3-186



PLANNING  
CITY OF ROSEVILLE  
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ATTACHMENT # 12

316 VERNON STREET, #104 • ROSEVILLE, CA 95678  
PHONE: (916) 774-5276

February 8, 1992

Placer County Board of Supervisors  
175 Fulweiler Avenue  
Auburn, CA 95603

SUBJECT: PLACER COUNTY GENERAL PLAN UPDATE

Honorable Board Members:

The City of Roseville appreciates the opportunity to provide input and summarize our concerns relating to the Placer County General Plan Update. The issues addressed in the updated General Plan will have significant impacts for all of Placer County, including Roseville. Given the limited time frame provided to review the information generated by the County and its consultants, the City's comments are very broad at this time. We look forward to working closely with the County on these issues and will be providing a more detailed set of comments in the near future.

- ACCELERATED REVIEW PERIOD - The City has previously expressed its concerns about the compressed time frame for review of the Placer County General Plan update in a letter to the Board of Supervisors from the City Manager dated February 3, 1993. Roseville Planning staff, as well as representatives from the other jurisdictions in the County, met with your Planning Department staff and Larry Mintier on November 18, 1992 to discuss the *Background Report*. County staff indicated at that time that no action would be taken by the Board until late 1993 and, therefore, that the cities had most of 1993 before comments would need to be submitted. It was also indicated that the *Issues and Options Report*, which had not yet been released, was targeted for an extensive public review and hearing schedule. This was to allow the jurisdictions and the residents of Placer County to fully analyze the information and submit comments before any preliminary direction would be provided by the Board of Supervisors. The proposed schedule included public workshops, joint Planning Commission/Board of Supervisor's meetings, a full set of separate Planning Commission Hearings and, finally, hearings and direction by the Board.

By accelerating the Issues and Options review schedule, and eliminating public input at the Planning Commission, the County has not provided the City of Roseville and the citizens it represents adequate time to provide complete comments. The information that the Board of Supervisors is scheduled to review on February 9, 1993 has significant implications and potential impacts to Roseville and its citizens. It is, therefore, critical that the Board provide Roseville, and all other affected cities, agencies and citizens, adequate time to review the information, and that it carefully consider the comments submitted.

A-3-187

To this end, the City of Roseville requests that the Board of Supervisors *not* take action at its February 9th meeting, but rather allow for a lengthier written comment period and additional opportunities for public input. The City of Roseville is willing to participate in the public hearing process, and encourages the County to consider a joint workshop with the impacted cities and agencies to directly discuss General Plan update related issues and concerns.

A-3-187

**FAULTY ASSUMPTIONS** - In reviewing the *Background Report*, the City of Roseville has preliminarily identified a number of inaccuracies and areas where full information has not been provided. As indicated, the City will be providing detailed comments identifying the areas of concern as soon as such a listing can be compiled. Utilizing correct background assumptions is important in that it forms the basis for the options that the County is reviewing, and decisions it will be making. Faulty or incomplete assumptions will lead to faulty or incomplete options and decisions.

One of the more critical examples of faulty assumptions being utilized by the County relates to the amount of growth that the cities are planning for and will be able to absorb. Based on a marketing analysis prepared for the City of Roseville by Recht Hausrath and Associates (RHA) in October 1992, the City's share of the countywide growth in the year 2010 is approximately 120,000 residents. This estimate is 23,000 to 30,000 more City residents than the County's projections of 90,000 to 97,000 people. The ultimate holding capacity (buildout) estimate of 90,000 for Roseville is approximately 36,000 to 46,000 residents lower than the City's estimate of 126,000 to 136,000 residents. This estimate is based on actual development applications that the City has received and is currently in the process of analyzing. It is our understanding that the growth projections for the City's of Rocklin and Lincoln may also be underestimated. This concern was originally expressed to County staff at the November 18, 1992 meeting.

A-3-188

Given the compressed time frame provided for public review and input, staff from the various jurisdictions have not had the opportunity to meet and reconcile the growth estimates. However, based on the numbers available to the City, the County has significantly underestimated the growth potential in the cities and, therefore, overestimated the need for urban type development in the unincorporated areas of the County. In addition, RHA has indicated that an increasing percentage of residential growth projected through 2010 will be of higher densities which can best be serviced by, and is most appropriately located within, the existing cities. It appears that the cities will be able to accommodate and are planning for a majority, if not all, of the urban growth projected for the County over the next twenty years. This brings into question the County's need to explore significant amounts of urban level development in unincorporated areas within a foreseeable planning horizon.

**OTHER CONCERNS AND CONSIDERATIONS** - The City of Roseville has a number of other significant concerns that it requests the Board consider, and allow additional time to review and discuss, before recommending direction on the *Issues*

*and Options Report*. A majority of these concerns have similarly been raised by the City in past comments on the Granite Bay and the Dry Creek/West Placer Plans. The primary areas of concern are generally summarized below:

- **Impacts to Programs, Services and Facilities** - Insufficient information has been provided relating to the impacts on facilities and services in Roseville under the various development and policy option scenarios, and how these impacts will be mitigated. In order to fully respond to the options, information is needed on impacts to City Park & Recreation, Library, Police, Fire, water, wastewater, solid waste, electric, roadway, transit and affordable housing programs, services and facilities.

A-3-189

- **Fiscal Impacts** - The fiscal impacts of the development options on both the City and the County have not been considered in sufficient detail. Issues that should be considered include the cost of providing urban level services in the County versus the cities, the impact to the County of the eventual incorporation of the new town proposed under Option 3, and impacts to the market in both the cities and County should urban level development be pursued in unincorporated areas.

A-3-190

Additional concerns and information on the above issues will be provided in detail to the County in a future letter.

### RECOMMENDATION

In conclusion, we cannot over stress the importance of having this process fully coordinated with each of the affected jurisdictions. It may be that there will be disagreements regarding assumptions and future directions regarding growth. However, as this issue is so vital to the region, we believe that it is far wiser to assure that there is adequate time to discuss these differences, discover where there may be errors in data and assumptions, and if necessary, agree to disagree where differences remain. In this spirit, we request that the Board defer any action on this item until after the March 17, Regional Issues Meeting involving your Board and Council members of each affected City. This should provide an excellent forum for additional discussion of issues and will provide an opportunity for County and City staffs to meet and review concerns with the background study, and the issues and options documents.

A-3-191

Thank you for your consideration of this request; we look forward to a continued dialogue regarding development and growth in Placer County.

Sincerely,



Patty Dunn  
Planning Director

CC: City Council  
City Manager



CITY OF ROSEVILLE  
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ATTACHMENT # 13

311 VERNON STREET • ROSEVILLE, CALIFORNIA 95678 • PHONE (916) 781-0200

March 22, 1993

Placer County Board of Supervisors  
175 Fulweiler Avenue  
Auburn, CA 95603

Honorable Board Members:

**SUBJECT: PLACER COUNTY GENERAL PLAN UPDATE**

The Roseville City Council appreciates the opportunity to express its views relating to the Placer County General Plan Update. Given the significance of this update, and the impact it will have on Placer County and all of its cities, we hope that the input of the City of Roseville will be an important consideration in the Board of Supervisors decision.

It is the position of the City of Roseville that "urban-scale" development is best planned for and accommodated within incorporated cities rather than unincorporated areas. As a result, the City supports growth Alternative 1 identified in the Issues and Options Report. This option would direct all new urban growth and development within the incorporated cities, including currently unincorporated areas to be annexed to the cities.

Consistent with this option, the City recommends that Alternative 1 be expanded and go one step further by entering into agreements with each incorporated city restricting the location of new urban development within designated urban growth limits. These growth limit areas would be delineated in consultation with the affected cities and would be based on projected market absorption over the next twenty (20) years. Further these agreements would require that fiscal impacts and costs associated with growth be addressed by the city(s) and County as part of any annexation proceedings. Until this occurred, urban densities and intensities of development would be prohibited outside of incorporated city limits. Attached to this letter, is draft language reflecting this recommendation as an amendment to Alternative 1.

A-3-192

As we have previously submitted to your Board, it is the City of Roseville's position that the cities in Placer County are planning for and can accommodate a majority of the growth projected for the County over the next twenty years, and that the cities are in a much better position to adequately service and provide for the needs associated with urban level development. In addition, we believe that this growth Alternative is far more protective of the environment and will assist in the protection of agricultural areas from premature conversion and siting of incompatible development.

Should the Board, disagree with the City of Roseville's recommendation, we again wish to point out the serious concerns we have with the other proposed alternatives. The City's support for directing urban growth into incorporated cities, and concerns about encouraging urban development within unincorporated areas, is based on a number of factors. The four primary factors are summarized below:

1. ***The County has considerably underestimated the amount of growth that the cities, including Roseville, are planning for and will be able to absorb over the next twenty years:*** The estimates for Roseville are significantly less than the City has currently received applications for and is in the process of analyzing as part of its Comprehensive Land Use Element Update. As an example, the 2010 estimates utilized by the County are 31,000 to 38,000 residents short of the 122,400 residents estimated for Roseville by Recht Hausrath and Associates, with the estimated "build out" approximately 50,000 residents less than the 140,700 residents that the City is currently analyzing. This underestimation results in a significant overestimation of growth that the unincorporated portions of the County can reasonably expect to capture, bringing into question the need for the County to be considering new growth areas at this time. A-3-193
  
2. ***Insufficient information has been generated relating to the impacts on the facilities and services in Roseville under the various growth and policy option scenarios, and how these impacts will be mitigated:*** Impacts can be anticipated to City park & recreation, library, police, fire, water, wastewater, solid waste, electric, roadway, transit and affordable housing programs, services and facilities. The County has not clearly identified how it would provide similar urban level services within unincorporated areas to mitigate impacts to the Roseville and the other cities. It is questionable as to whether the County would want, or can afford, to become an urban level service provider. A-3-194
  
3. ***The fiscal impacts of the growth options has not been considered in sufficient detail:*** Issues that should be considered include the cost of providing urban level services in the unincorporated County versus the cities, the impact to the County of the eventual incorporation of new towns proposed under Alternative 3, and impacts to the market in both the cities and County should urban development be pursued in unincorporated areas. In analyzing these issues, the County will likely find that pursuing urban development in unincorporated areas is not a long-term fiscally sound proposition. A-3-195
  
4. ***Planning for future development needs within incorporated areas can result in a more logical and environmentally sensitive growth pattern:*** It appears that Roseville, as well as the other Placer County cities, will continue to expand and A-3-196

aggressively plan for growth over the foreseeable future. By planning growth within the incorporated cities, or in areas to be annexed by the cities, density is concentrated into existing urbanized areas where it can more efficiently be accommodated, helping to remove development pressures from existing open space or agricultural lands. If the County were to pursue new towns or other urban development in unincorporated areas in addition to the growth being planned by the cities, the result could be piecemeal, premature sprawl.

A-3-196

Based upon the above, and other issues, the City of Roseville questions both the need and desirability of Placer County providing for urban development within unincorporated areas. Of particular concern is the County considering urban development within the various new towns in the vicinity of Roseville. The City is in the process of submitting applications to the Placer County LAFCO to expand its sphere of influence to include the areas covered by the Highlands (Cavitt Ranch) project and Phase I of the Villages at Blue Oaks project. In addition the Stanford Ranch West/Athens Road area is already within the City's sphere. If development is to occur within these or other areas adjacent to Roseville, it should be under the jurisdiction of the City. The City, therefore, reiterates its support for directing future growth to incorporated rather than unincorporated areas, as reflected in the expanded growth Alternative 1.

The Roseville City Council appreciates the Board of Supervisors consideration of our concerns, and looks forward to continuing to work cooperatively with the County on growth and other issues which impact all of our futures.

Sincerely,

  
Bill Santucci  
Mayor

CC: City Council  
City Manager  
Community Development Director  
Planning Director  
County Administrative Officer  
Placer County Planning Director

ATTACHMENT 1  
City of Roseville Recommended Modification  
Alternative 1

(Note: The City's recommended modification is shown below in *italics*)

---

ALTERNATIVE 1: NEW URBAN GROWTH DIRECTED TO CITIES

This alternative emphasizes shifting jurisdictional control over new growth and development from the County to the cities within the county. Accordingly, County General Plan policies would be modified to encourage most new urban-scale growth to occur within the incorporated cities of Placer County (including currently unincorporated areas within city spheres of influence to be annexed to cities), rather than in unincorporated areas of the county. This would in part be accomplished by the following measures:

- ① Limiting the growth potential implied by the current County General Plan, Agricultural Element, community plans. No new growth areas would be identified.
- *Entering into an agreement with each incorporated city restricting the location of new urban development within designated urban growth limits. Such areas would be delineated based on projected market absorption over the next twenty (20) years and would be designated in the County General Plan following consultation with each affected city.*

*In addition to specifying the location for new growth, the agreement would prohibit urban densities and intensities of development until annexed by the city. The agreement would also set forth that fiscal impacts and costs associated with growth shall be addressed by the city and County as part of annexation proceedings.*

- ① Reducing current development potential in select unincorporated areas. Such reductions would occur where existing plan designations reflect an unrealistic level of development given the capacities of area resources, infrastructure, and/or services. In addition, unincorporated area development capacity would be reduced where necessary to support redirection of growth to the cities.

(From Placer County General Plan Update Issues and Options Report, January 12, 1993, page 2-2.)

A-3-197

**A-4 City of Roseville City Manager (10/21/93)**

A-4-1. City of Roseville feels that County is not interested in City's concerns

*The 45-day review period for the Draft EIR provided by the County complies with the requirements of State law. Nonetheless, the Board of Supervisors and Planning Commission extended by several months the public comment period on the Draft General Plan.*

A-4-2. *Draft EIR* does not sufficiently analyze and mitigate impacts on Roseville's streets

*See common response #3.*

A-4-3. *Draft Plan* buffer standards are unrealistic and will not protect Roseville from adverse effects

*The concerns expressed in this comment refer to new growth areas that no longer appear on the Land Use Diagram.*



CITY MANAGER  
CITY OF ROSEVILLE

TRADITION • PRIDE • PROGRESS

311 VERNON STREET, #200 • ROSEVILLE, CA 95676 • (916) 781-0362

October 21, 1993

PLACER COUNTY  
DATE RECEIVED

PLANNING COMMISSION

Placer County Planning Commission  
Attn: Chairman Larry Sevison  
11414 B Avenue  
Auburn, CA 95603

Dear Chairman Sevison and members of the Commission:

**SUBJECT:** Roseville City Council's Position on the Placer County  
General Plan Update and Draft EIR Documents

The City Council of Roseville opposes the adoption of the proposed Placer County General Plan Update and certification of the associated Draft EIR. This opposition stems from two concerns. The first relates to the process used by the County to date to solicit meaningful input from affected Cities and residents of the County. Throughout the County's General Plan update program, the City has identified significant concerns with the Background Report and the Issues and Options document. The combination of the process and the lack of response or incorporation of these concerns into the General Plan Policy document and Draft EIR causes the City to believe that the County is not interested in the City's concerns and that these concerns are not important.

A-4-1

Our second concern relates to the gross inadequacies of the General Plan documents and the DEIR. As presented to your Commission by our staff on October 14, 1993, even a cursory, initial review of these documents resulted in eighty-four (84) pages of comments. These documents have glossed over major issues and have not directly addressed any of the concerns previously raised by the City.

For instance, severe traffic and circulation impacts are projected for the City of Roseville. Yet, no feasible mitigation measures or alternatives are identified to mitigate or avoid any of these impacts. Expansion of City roads to six and eight lanes are proposed throughout Roseville. Eight travel lanes would also be required for Cirby Way where the Council has already deemed in past actions that expansion to even six lanes is not feasible or desirable. These documents also do not identify alternatives to the use of City roads, such as the proposed Route 102, and do not adequately identify all of the impacts. There is no discussion of impacts to Main Street, but impacts to Baseline are projected to be significant.

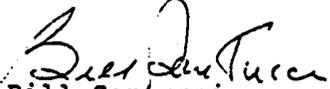
A-4-2

During Board of Supervisors' discussion of the Issues and Options Report, the City was told that permanent buffers, internal to the project area, would be required to protect Roseville from adverse effects of the new growth areas. However, the land use diagram does not reflect any buffers and as proposed in the policy document, are unrealistic and ultimately ineffective in protecting Roseville from adverse effects.

A-4-3

For these reasons the City Council is opposed to the adoption of the proposed General Plan update. Further, we urge your Commission to consider all of the comments submitted by Roseville and fellow cities, and to recommend that the Board of Supervisors not adopt the General Plan. On behalf of the City Council, I thank you in advance for your consideration of our concerns.

Sincerely,

  
Bill Santucci  
Mayor

cc: City Council  
City of Rocklin  
City of Lincoln  
City of Loomis  
Board of Supervisors  
City Attorney Office  
Planning Director

**A-5 City of Auburn (11/10/93)**

A-5-1. *Draft Plan and Draft EIR are confusing and lacking in detail, and there appear to be inconsistencies among elements of plan*

*Comment noted; no response necessary.*

A-5-2. *Draft EIR does not adequately describe method by which new growth areas were selected*

*Chapter 10 of the Final EIR describes the process by which the Board of Supervisors defined the Draft Plan; the new growth areas have since been removed from the Land Use Diagram.*

A-5-3. *Draft EIR does not include alternatives or mitigation measures to lessen the impacts of growth*

*Refer to common responses #1 and #2 and to Chapter 10 of the Final EIR.*

A-5-4. *Draft Plan land use pattern does not lend itself to non-automobile transportation*

*The Policy Document supports concentrating development along transportation corridors, both within and outside of cities.*

A-5-5. *Draft Plan's new growth areas appear inconsistent with goals and policies of the Plan*

*Refer to common response #11.*

A-5-6. *Draft EIR incorrectly refers to I-80 overcrossing at Auburn Folsom Road*

*The text in the Final EIR has been corrected to indicate a widening of Auburn Ravine Road at I-80 instead of Auburn Folsom Road.*

A-5-7. *Draft EIR traffic projections for Highway 49 change dramatically at Dry Creek Road; why?*

*The forecasted volumes have been re-evaluated in the Final EIR.*

A-5-8. *Draft EIR doesn't appear to accurately represent future traffic volumes in Foresthill Road*

*The traffic forecasts were based on Foresthill's population increasing from about 4,900 in 1990 to about 6,600 in 2010. The traffic forecast for Foresthill Road east of Old Foresthill Road has been corrected in the Final EIR.*

A-5-9. *Draft EIR doesn't propose sufficient mitigation for City of Auburn roadways*

*Refer to common response #3.*

A-5-10. *Draft EIR approach to alternatives analysis is disturbing*

*Refer to common response #1.*



Airport 823-0744  
 Building 823-4240  
 City Clerk 823-4242  
 City Manager 823-4299  
 Community Development 823-4244  
 Finance/Personnel 823-4247  
 Fire 823-4265  
 Police 823-4237  
 Public Works 823-4250  
 1225 Lincoln Way  
 Auburn, California 95603  
 FAX (916) 865-5508

November 10, 1993

Loren Clark  
 Placer County Planning Department  
 11414 "B" Avenue  
 Auburn, CA 95603

Subject: Draft Placer County General Plan and Draft Environmental Impact Report (DEIR).

Dear Mr. Clark:

The City of Auburn has reviewed the County Wide General Plan Update and DEIR. Although we have not had the opportunity to review these documents as thoroughly as we might like, a summary of the City of Auburn's comments and concerns follows:

- 1) Generally speaking both the proposed Placer County General Plan Update and the DEIR were confusing and lacking in detail. An EIR is supposed to serve as an information and disclosure document, in which capacity this document is lacking. In addition there seem to be some consistency problems between different elements of the plan. A-5-1
- 2) The City of Auburn remains concerned about the impacts of shifting growth from the incorporated cities to new growth areas in the county. The method by which the specific locations for the proposed new growth areas were selected and the traffic and ecological implications of shifting growth to these specific sites is also cause for concern and were either not addressed or not adequately addressed in the DEIR. A-5-2
- 3) It is very disturbing to note that on page 1-9 the DEIR states that "in eight major areas the Draft General Plan, taken as a whole, will result in potentially-significant or significant adverse impacts." A-5-3
  1. Land Use
  2. Traffic Congestion
  3. Cultural Resources
  4. Loss of Farmland
  5. Loss of Agricultural Production
  6. Habitat Conversion and Habitat Quality Reduction
  7. Increase in Air Pollutant Emissions
  8. Traffic Noise

However no alternatives or mitigation measures to lessen these impacts are included in the DEIR.

- 4) To encourage and make feasible future transit options such as rail, bus, etc... it would be logical to cluster new development and growth areas along transportation corridors such as I-80. The proposed plan would not seem to result in land use patterns that would lend themselves to nonautomobile transportation alternatives.
- 5) The proposed new growth areas would not seem to be consistent with many of the goals and policies noted in the General Plan Update.
- 6) The following errors (?) in the discussion of transportation and circulation should be corrected:
- a. Pg. 4-5 - Auburn Folsom Road, widen I-80 overcrossing, there is no such over crossing, do they mean the Maple Street bridge?
  - b. Pg. 4-23/24 - Route 49, between 1990 and 2010 an increase of 11,000 ADT is projected on Hwy 49 between the Nevada County Line and Dry Creek Road. However south of Dry Creek Road the projected increase in ADT is only 2,000 to 3,000 what happens to all those cars at Dry Creek Road?
  - c. Pg. 4-26 - Foresthill Road, east of the intersection of Old Foresthill Road and New Foresthill Road there is a projected increase of 1,000 ADT, no increase in ADT is projected from that point to Lincoln Way. The projected ADT increase seems low given the growth potential in Foresthill, in addition the Land Use Map show the lower Foresthill Divide with a residential density of 1 to 4 dwelling units per acre. The implications of this land use designation are obviously not reflected in the ADT figures for Foresthill Road.
- 7) The City of Auburn is concerned about the large increases in traffic projected for Auburn Folsom Road and Indian Hill Road among others, along with the lack of practice mitigation measures (at some point adding additional lane ceases to be a viable mitigation). How does the County propose to mitigate these impacts to the City circulation system?
- 8) The lack of analysis regarding alternatives to the proposed plan is disturbing given the potential adverse impacts noted in the DEIR and CEQA requirements, litigation potential, etc... requiring such analysis. Although the previously prepared Issue and Options Report identified different alternatives in a general context the varied specific impacts of each alternative were not identified. In addition the way in which the preferred alternative and its respective impacts was derived was not identified.

A-5-4

A-5-5

A-5-6

A-5-7

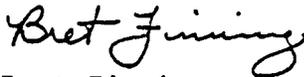
A-5-8

A-5-9

A-5-10

The City of Auburn supports the current efforts of the Placer County Planning Commission to improve the County Wide General Plan Update. We appreciate having the opportunity to review and comment on the County Wide General Plan Update and DEIR. If you have any questions please feel free to contact me at the Community Development Department, in the Auburn Civic Center, 1225 Lincoln Way, Auburn, CA 95603 (916) 823-4244.

Sincerely,



Bret Finning  
Assistant Planner

COMMUNITY DEVELOPMENT DEPARTMENT  
Cindy Schaer, Director

CC: City Council  
Planning Commission  
City Manager

**A-6 Town of Loomis (11/15/93)**

A-6-1. *Draft EIR* should include full funding and implementation of the 2010 transportation system, based on LOS standards of jurisdictions

*Refer to common response #3.*

A-6-2. Town of Loomis is opposed to new growth areas

*Refer to common response #11.*

# Town of Loomis

P.O. BOX 1327  
LOOMIS, CA 95650  
(916) 652-1640 • FAX (916) 652-1847

November 15, 1993

Placer County Board of Supervisors  
175 Fulweiler Avenue  
Auburn, CA 95603

Re: Placer County General Plan and Environmental Impact Report

Honorable Chairman and Members of the Board:

Thank you for sending us copies of the Placer County General Plan and General Plan Environmental Impact Report and notice of hearings and comment deadlines. We understand that comments on the Draft Environmental Impact Report are due on November 15, 1993 and have the following comments.

With respect to the Draft EIR, the Town Council believes that the mitigation measures should include the full funding and implementation of the 2010 Mitigated Transportation System as appropriate to the level of development. Additionally, we feel that the County's General Plan should reflect the improvements required to meet the Levels of Service required by the various jurisdictions.

A-6-1

With respect to the County General Plan, the Town opposes the inclusion of new growth areas within the County. As Roseville has stated, "adequate areas suitable for urban growth for the next twenty years already exist in the County and Cities, and the addition of the new growth areas in the County are not needed to meet reasonable market projections." In fact, the Town of Loomis is diligently working on an economic development plan for the Town in order to keep the Town fiscally sound in the future. The approval of new growth areas in the County may make such an endeavor much more difficult.

A-6-2

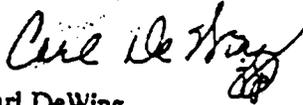
Also, since we do not have a Sphere of Influence outside of our existing boundaries, we are concerned how your actions may impact us in the future if additional new growth areas were placed adjacent to our borders.

Post-It™ brand fax transmittal memo 7671		# of pages	2
To	Placer County Planning Dept. + Commission	From	Carl Deering, Mayor Town of Loomis
Dept.		Phone #	652-1840
Fax #	889-7499	Fax #	652-1847

6140 HORSESHOE BAR ROAD, SUITE X, LOOMIS, CA 95650

Finally, we are pleased to understand that the hearing schedule for the Planning Commission has been extended and would encourage you to have full and open hearings, including additional meetings with City and Town officials, on this matter of such importance to the citizens of Placer County.

Sincerely,



Carl DeWing  
Mayor

cc: County Planning Commission  
Placer County Planning Department

**A-7 City of Rocklin (11/15/93)**

A-7-1. *Draft EIR does not clearly identify which of the alternatives considered is environmentally superior*

*Chapter 10 of the Final EIR includes a discussion of the environmentally superior alternative.*

A-7-2. *Draft EIR does not make clear which transportation policies are intended to mitigate impacts on traffic in Rocklin*

*The policies cited are intended to address transportation impacts generally. The Policy Document does not include policies specifically intended to address traffic impacts in Rocklin, although the Circulation Plan Diagram identifies roadway improvements that will at least partially address these impacts. See also common response #3.*

A-7-3. *Draft EIR does not address impacts on collector roadways in Rocklin, specifically Midas Avenue and Whitney Boulevard*

*Since it focuses on all of Placer County, the EIR does not address traffic impacts to the level of specificity suggested, particularly for areas within the county's cities.*

A-7-4. *Draft EIR traffic forecasts for Pacific Street and Stanford Ranch Road are higher than those in North Rocklin Traffic Study*

*The traffic forecast in Table 4-18 reflects the "2010 Base Transportation System" which does not include HOV lanes on I-80 through Roseville and Rocklin. HOV lanes on I-80 were assumed to exist by 2020 in the City of Rocklin's North Rocklin Traffic Study (and were also included in Placer County's 2010 Mitigated Transportation System). Without the HOV lanes on I-80 by 2010, traffic volumes are expected to be significantly higher on Pacific Street and other roadways parallel to I-80 due to congestion on that freeway. The traffic forecast on Stanford Ranch Road between Park Drive and West Oaks has been re-evaluated in the Final EIR (11,000 ADT) and is less than the City of Rocklin's 2020 forecasts.*

A-7-5. *Draft EIR does not address possible nuisances associated with development near landfill*

*With removal of the Stanford Ranch West Specific Plan Area from the Land Use Diagram, the concerns expressed in this comment are no longer pertinent. Refer also to common response #6.*

A-7-6. *There is adequate land within Placer County cities to accommodate development through 2010, so new growth areas are unnecessary*

*Refer to common response #11.*



# City of Rocklin

3970 Rocklin Road  
P.O. Box 1138  
Rocklin, CA 95677  
(916) 632-4000  
TDD 632-4013

November 15, 1993

Faxed with Hard Copy by Mail

Loren Clark, Senior Planner  
Placer County Planning Department  
11414 "B" Avenue  
Auburn, CA 95603

Re: Draft EIR for the Placer County General Plan

Dear Clark:

The City of Rocklin Community Development Department submits the following comments in regard to the Draft EIR on the Countywide General Plan:

1. It is not clear in the EIR document as to which of the alternatives discussed in Chapter 10 is found to be the environmentally superior alternative.
2. The EIR identifies county policies as mitigations to some of the impacts. It is unclear as to which of the transportation policies (i.e., 3.A.9, 3.A.11 of 3.A.14) are intended to mitigate traffic impacts on regional and local roads within the City of Rocklin.
3. The EIR identifies the impacts of the County General Plan on some Rocklin streets. The major streets identified, however, are arterials. Connecting to these arterials are several collector streets which are not adequately addressed in the EIR. Of particular concern is the impacts on the Rocklin streets such as Midas Avenue and Whitney Boulevard from the development of the new towns.
4. Table 4-18 on pages 4-32 indicates there will be more traffic on Pacific Street (between Rocklin Road and Sierra College Boulevard) and Stanford Ranch Road (between Park Drive and West Oaks Boulevard) in the year 2010 than is proposed in the City of Rocklin's North Rocklin Traffic Study for the year 2020. This inconsistency between the data should be reviewed by the traffic consultant.

A-7-1

A-7-2

A-7-3

A-7-4

Administrative Services  
632-4000  
FAX 632-4173

Building Department  
632-4030  
FAX 624-4759

City Hall  
632-4050  
FAX 624-8018

Community Development  
632-4020  
FAX 624-4759

Community Services  
& Facilities  
632-4100  
FAX 632-4111

Engineering Department  
632-4042  
FAX 624-4759

Fire Department  
632-4150  
FAX 624-2677

Public Works Department  
632-4130  
FAX 632-4177

Police Department  
632-4060  
FAX 624-2677  
TDD 632-4187

5. The EIR addresses the capacity issue of the Western Regional Sanitary Landfill. The EIR, however, does not address the possible nuisances that may be associated with development of the adjacent new town. Nuisances could result in complaints that would bring about pressures to reduce the life expectancy of the landfill.

A-7-5

Rocklin's General Plan as well as the general plan for other cities within the South Placer area provide adequate lands for residential and non-residential land uses well beyond the year 2010 and in the case of Rocklin, even beyond the year 2020. A closer review by the county of the general plans of Lincoln and Roseville could identify and indicate the amount of land available beyond 2010 within those two cities.

A-7-6

It appears that there is adequate land of new growth within the cities and within existing unincorporated county communities without the necessity of allowing speculative new towns to be developed. The City of Rocklin is still favorable to Option 1 of the Issues and Option Report, directing new urban growth in the cities.

If you have any questions, please call me at 632-4020.

Very truly yours,

*Terry A. Richardson for TAR*

Terry A. Richardson  
Community Development Director

TAR:smh

11159302

**A-8 Town of Loomis (06/03/94)**

- A-8-1. The *Draft EIR* should not assume that specific mitigation of roadway impacts will be deferred to subsequent project review and implementation, particularly with respect to Sierra College Boulevard.

*Refer to common responses # 2 and #3.*

# Town of Loomis

RECEIVED

JUN 13 1994

J. LAURENCE MINTIER  
& ASSOCIATES

P.O. BOX 1327  
LOOMIS, CA 95650  
(916) 652-1840 • FAX (916) 652-1847

June 3, 1994

Placer County Board of Supervisors  
175 Fulweiler Avenue  
Auburn, CA 95603

PLACER COUNTY  
DATE  
RECEIVED  
JUN 08 1994  
PLANNING DEPARTMENT

Re: Concerns Regarding Environmental Impact Report and Policies  
for the Placer County General Plan Update

Honorable Chairman and Members of the Board:

We understand that you are still holding hearings on the Placer County General Plan Update and thank you for the opportunity to present some additional concerns from the Town of Loomis.

It is our understanding that the policies in the plan are "self-mitigating" and therefore stand as mitigation measures as well as policies.

On November 15, 1993, the Town wrote a letter stating:

With respect to the Draft EIR, the Town Council believes that the mitigation measures should include the full funding and implementation of the 2010 Mitigated Transportation System as appropriate to the level of development. Additionally, we feel that the County's General Plan should reflect the improvements required to meet the Levels of Service required by the various jurisdictions.

The Town of Loomis is concerned regarding the future needed improvements for Sierra College Boulevard. We have recently written to both Lincoln and Rocklin regarding our concerns, and need to ensure that we have protected the Town as best we can.

The future road network assumed in evaluating the cumulative plus project conditions, assumes that Sierra College Boulevard will be widened to a minimum of four lanes through Loomis. There is no secure funding source for this widening. Mitigation for the impacts of Bickford Ranch and other regionally significant projects should be a regional based traffic fee that would include improvements to all roads of regional significance and would apply to developments in Loomis, Rocklin, Roseville, Placer County and

Lincoln. This should be identified as mitigation in all project approvals with development permits contingent on paying the fee. It is clear that Loomis does not have the growth potential to finance this improvement. Without this mitigation, the result will be Level of Service F on Sierra College Boulevard through Loomis with the attendant increase in air pollution.

Policy 3.A.9 (page 52) states: The County shall work with neighboring jurisdictions to provide acceptable and compatible levels of service and joint funding on the roadways that cross the county's boundaries.

Policy 3.A.14 states: The County shall assess fees on new development sufficient to cover the fair share portion of that development's impacts on the local and regional transportation system. Exceptions may be made when new development generates significant public benefits (e.g., low income housing, needed health facilities) and when alternative sources of funding can be identified to offset foregone revenues.

These mitigations do not address the Sierra College Boulevard funding issue specifically as required by case law which mandates that specific mitigation cannot be postponed with the understanding that it will be addressed at later approval. We are now asking that you reconsider these mitigation measures in a more specific manner. Also, while we generally have no other comments on the plan, we must express opposition to approval of the Placer County General Plan, unless and until it is amended to address these stated concerns.

A-8-1

Finally, the Town would appreciate receiving a copy of the response to our comments and notice of any further hearings that are held on the Environmental Impact Report and on the project itself.

Thank you for your consideration.

Sincerely,

  
Kathy Kerdus  
Planning Director

cc: County Planning Commission  
Town Council  
Planning Commission  
Town Manager

---

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**B. School Districts**

---

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**B-1 Placer County Office of Education (10/13/93)**

B-1-1. *Draft EIR* contains no analysis of school impacts; commentor requests that attached analysis be incorporated into Final EIR

*Refer to common response #7.*

B-1-2. Recommended analysis for inclusion in Final EIR

*Refer to common response #7.*

# PLACER COUNTY OFFICE OF EDUCATION

360 Nevada Street, Auburn, CA 95603-3779 --- (916) 889-8020

JOHN C. REINKING, Placer County  
Superintendent of Schools

October 12, 1993

Mr. Fred Yeager, Director  
Placer County Planning Department  
11414 B Avenue  
Auburn, Ca 95603

Dear Fred:

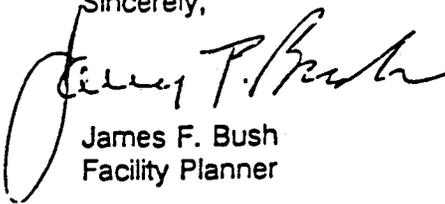
Please accept the following comments on the Draft Environmental Impact Report (DEIR) for the Countywide General Plan. In reviewing this DEIR, I did not find any analysis of the potential impacts upon schools as a result of the projected housing units shown in the plan, even though there is a schools section in the Policy Document.

This Policy document provides, among other things, (4.J.6) that "the county should include schools among those public facilities and services that are considered an essential part of the infrastructure that should be in place as development occurs." Because of this and under CEQA requirements, I believe that a schools section should be added.

Therefore, on behalf of the school districts in Placer County, I request that the following analysis be placed in the Draft EIR and Final EIR. Individual school districts may wish to submit their own comments.

Thank you for your continued support, and I look forward to discussing these issues in the Public Hearing Process.

Sincerely,



James F. Bush  
Facility Planner

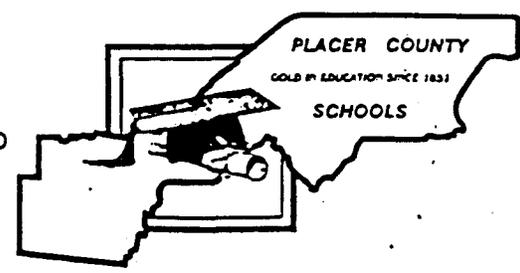
JFB:nt  
Enc.

cc: John C. Reinking, County Superintendent  
Doug Lewis, Schools Attorney  
Placer County Superintendents

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PLACER COUNTY  
OCT 15 1993  
PLACER COUNTY PLANNING DEPARTMENT



B-1-1

**SCHOOL NEEDS ANALYSIS**

**PLACER COUNTY GENERAL PLAN**

**DEIR**

B-1-2  
↓

**CONTENTS:**

- A. Existing district enrollment vs. capacity
- B. County regional analysis area vs. school district boundaries
- C. Projected housing units
- D. Projected student generations
- E. School facility needs/costs
- F. Projected developer fee income compared to facility costs
- G. Community college impact
- H. Potential impacts and proposed mitigation

Compiled by:  
Jim Bush  
Placer County Office of Education  
Director of Planning

## A. Existing District Enrollment vs Capacity

Tables I-III have been prepared for the K-12 Districts in the County. The enrollments are based upon 1992/93 counts. The official 1993/94 counts are not due until the end of October. Table III represents each District's capacity. Unhoused students are defined as those students that are attending classrooms that are portable (trailers). These are classified as temporary until permanent facilities can be constructed. Some Districts currently have permanent schools or additions to existing schools under construction or have gone year round which will result in a change of their capacity.

The Districts which have schools under construction are:

Auburn Union  
Foresthill  
Rocklin Unified  
Tahoe-Truckee Unified  
Western Placer Unified  
Roseville City  
Roseville High School District  
Eureka Union  
Dry Creek

Based upon the student enrollment tables the following findings can be made:

1. K-12 Student Enrollment in Placer County has increased from 26,689 in 1986/87 to 37,612 in 1992/93. This is an increase of 10,923 students (29%).
2. Over the next 10 years K-12 enrollment is expected to climb to 64,318, an increase of 26,724.
3. Currently the Districts in the County are operating with 2,563 students over capacity. These students occupy overcrowded classrooms or non-State approved structures such as trailers.
4. Only four (4) of the 19 Districts in the County are operating under capacity.
5. Districts have taken steps to correct the overcrowded problem through application for State funds, voter approved General Obligation Bonds and/or Developer Agreements in order to raise sufficient funds to construct new facilities.

B. County Regional Analysis Area vs. School District Boundaries

Table IV breaks down each regional analysis area into the specific school districts that fall within their boundary. It is interesting to note that the new growth areas of the Villages of Dry Creek and Placer Villages are served in part by Elverta, Grant, and Center School Districts which are headquartered in Sacramento County. These districts should be placed upon the distribution lists for proper analysis of this plan and future projects in these areas.

C. Projected Housing

Table V summarizes the buildout of new housing units scenarios for 2010 and 2040. These numbers were taken from the issues and options document dated January 12, 1993, Table 2-3, and also from the county wide General Plan Draft EIR dated October 1, 1993, Table 2-7. As a result of this information 66,651 new housing units could be constructed in Placer County by 2010 and a total of 102,307 by 2040.

D. Projected Student Generation

Table VI projects the number of students that would be generated as a result of the new dwelling units. The student yield rates used are generally accepted county wide for school planning purposes especially in South Placer. As a result of this analysis, it is projected that 15,791 new K-12 students will be generated by 2010 and 38,230 new K-12 students by 2040.

E. School Facility Needs/Costs

Table VII shows the projected costs associated with the new students generated as a result of approval of this General Plan. The cost per student was taken from the Auburn Union and the Placer High School District Developer Fee Justification documents. They are representative to school construction costs throughout the county.

**As a result of the students generated, 49 new schools will be needed at a cost of \$544,796,977.**

F. Projected Developer Fee Income Compared to Facility Costs

Table VIII projects the square footage that could result from development of the future dwelling units. It was assumed that the average single family home would be 1,800 sq. ft. and that the average multi-family unit would be 750 sq. ft. The projected dwelling units will generate 93,866,850 sq. ft.

Based upon existing state developer fee (Gov. Code 58030 Fee) residential construction would generate \$154,880,303, and commercial/industrial construction would generate \$16,408,900 for a total of \$171,289,282.

Under SB 1287 districts are allowed to collect an additional \$1.00 per square foot which would generate \$93,866,850. However, in the event Proposition 170 fails in November 1993, the ability to collect this fee is removed.

There will be a facility funding shortfall of \$279,640,919 if Proposition 170 is approved. If it is denied the shortfall will be \$373,507,775.

Over the past 10 years school districts have developed alternative financing programs which provide for development projects to fund school facility costs which are beyond the normal state fees. Based upon these programs the following districts have pursued state funds or have gone to the voters for General Obligation Bonds. The following is a summary of districts who have adopted financing programs which are beyond the state developer fee levels.

	<u>Devel. Agree.</u> <u>(MBA's)</u>	<u>Mello Roos</u> <u>CFD</u>	<u>GO Bonds</u> <u>Voter Approved</u>
Auburn Union	X	X	
Dry Creek		X	
Eureka	X		X
Foresthill	X		
Loomis Union	X		
Placer Hills	X		
Rocklin Unified		X	X
Roseville City	X	X	X
Roseville H.S.D.	X		X
Tahoe-Truckee	X		X
Western Placer		X	X

## G. Community College Impact

The Sierra Community College District currently provides their primary educational facilities in Rocklin. There are approximately 15,000 students on this campus. The ultimate capacity of the campus is being planned for 23,000 students. In addition, the district also operates off campus sites in Truckee, North Tahoe, Grass Valley/Nevada City and at various high schools around the county.

The student yield rate factor for community college students commonly used in California is .16 student per dwelling unit.

Based upon a 2040 buildout of 102,307 dwelling units, approximately 16,369 college students would be generated. A new community college site will be needed. It is anticipated that the site would be needed in the Placer Villages project in order to serve the South Placer area new town projects.

## H. Potential Impacts and Proposed Mitigation

The impacts created by the proposed Countywide General Plan upon schools are associated with the designation of school sites, acquisition of school sites and the funding and construction of school facilities when they are needed.

### 1. School sites and acquisition of school sites -

Based upon the schools needs analysis of the draft EIR, a total of 49 new K-12 and one community college site will be needed within the unincorporated area of the county by the year 2040

#### Mitigation -

Designation of school sites on the General Plan/Community Plan land use maps are requested, Policies 4.J.3-4.J.9 addresses this issue.

### 2. Facility Funding -

Buildout of the plan would require school districts to construct 49 new K-12 schools at a cost of \$544,796,977. Current State allowed developers fees would generate approximately \$171,289,282. SB 1287 fees would generate \$93,866,850. However, if Proposition 170 is denied this income would be eliminated.

Proposition 170, which is on the November 2, 1993 State Ballot, would allow a 50% voter approval for General Obligation Bonds to fund school facilities. It would also allow continued collection of the SB 1287 fee. It would also limit all individual school districts' ability to receive fees in excess of the State allowable fee, except for General Plan Amendments, rezone projects, and the creation of Mello-Roos CFD's. However, in the event Proposition 170 fails the implications of SB 1287 is removed and school districts would be allowed to mitigate school impacts beyond

State allowable fees.

As stated in a previous section, 11 of the 19 school districts in the County currently have a facility funding program in excess of the State allowable fee.

Without the ability to continue with already adopted financing plans, the school districts in the County would suffer up to a \$373,507,775 shortfall in their ability to provide school facilities to meet the needs of students generated from approval of this plan. This would create a significant impact upon the districts.

Mitigation

There is no suggested mitigation in the DEIR Plan. Policies 4.J.7, 4.J.10, 11, 12 address the issue.

It is requested that a mitigation measure be placed in the DEIR to allow school districts to adopt and implement individual financing plans which, to the extent possible, rely upon developer fees, developer agreements/Mello-Roos CFD's, General Obligation Bonds, and State funding when available, in order to satisfy student facility needs.

TABLE I  
ENROLLMENT - CURRENT AND PROJECTED

PLACER COUNTY SCHOOLS\*  
PAST AND CURRENT ENROLLMENT SUMMARY

	1986/87	1987/88	1988/89	1989/90	1990/91	1991/92	1992/93
Enrollment	26,689	27,993	29,505	31,062	33,795	35,176	37,612
Student Increase	+1,096	+1,304	+1,512	+1,557	+2,733	+1,381	+2,436
% of Change	+4.2%	+4.9%	+5.4%	+5%	+8.1%	+3.9%	6.48%

PROJECTED ENROLLMENT

	1991/92	1992/93	1997/98 (5 Year)	2002/03 (10 Year)
Enrollment	35,176	37,612	47,317	64,318
Student Increase	+1,381 (1 Yr)	+2,463 (1 yr)	+12,141	+29,142
% of Change	3.9%	6.48%	34%	83%

TABLE II

## INDIVIDUAL SCHOOL DISTRICT ENROLLMENT PROJECTIONS

School District	Existing Enrollment 1992/93 *	Enrollment Projection 5 Year	Enrollment Projection 10 Year	10 Year Increase**
Ackerman	362	505	662	+ 300
Alta-Dutch Flat	209	277	352	143
Auburn Union	2,854	3,909	5,256	2,402
Colfax	504	612	752	248
Dry Creek	2,055	2,674	4,119	2,064
Emigrant Gap	18	18	18	0
Eureka Union	2,323	3,452	4,825	2,502
Foresthill Union	809	1,202	1,612	803
Loomis Union	1,745	2,245	2,961	1,216
Newcastle	301	360	410	109
Ophir	227	282	357	130
Penryn	319	354	375	56
Placer Hills Union	1,590	2,082	2,577	987
Roseville City	5,093	6,381	7,208	2,115
Rocklin Unified	3,266	5,615	11,670	8,404
Tahoe-Truckee	4,182	4,131	5,034	852
Western Placer	2,782	3,119	4,047	1,265
Placer High	4,208	4,561	5,288	1,080
Roseville High	4,328	5,556	6,813	2,485
<b>TOTAL</b>	<b>37,612</b>	<b>47,335</b>	<b>64,336</b>	<b>26,724</b>

\* Based on October, 1992 CBEDs

\*\* The 10 year increase represents the number of new students projected to be added to the 1992/93 enrollment year over a 10 year period.

### III. UNHOUSED STUDENTS

The charts on the following pages show all of the school districts in Placer County, comparing each district's permanent building capacity versus the district enrollment. Based upon the information received through the questionnaire, there are 3,364 unhoused students in the county, representing 11.4% of the students.

The majority of the unhoused students are located in Southern Placer County, from Auburn south to Roseville. Chart #3 through Chart #6 illustrate the problem in six school districts -- Auburn Union, Eureka Union, Placer Hills, Roseville City, Rocklin Unified, and Roseville High School.

Unhoused students generally attend school in overcrowded classrooms, portables, and trailers. The trailers are not approved by the state and can only be used for three years at a time.

TABLE III  
UNHOUSED STUDENT COUNT

School District	District Capacity	District Enrollment	Unhoused*
Ackerman	280	362	82
Alta-Dutch Flat	228	209	-19
Auburn Union	1,842	2,854	1,012
Colfax	522	504	-18
Dry Creek	1,021	2,055	1,034
Emigrant Gap	17	18	1
Eureka Union	1,532	2,323	791
Foresthill Union	780	809	29
Loomis Union	1,726	1,745	19
Newcastle	270	301	31
Ophir	210	227	17
Penryn	360	319	-41
Placer Hills Union	1,173	1,590	417
Roseville City	4,691	5,093	402
Rocklin Unified*	1,589	3,266	1,677
Tahoe-Truckee**	4,527	4,182	-345
Western Placer	2,545	2,782	237
Placer High	3,205	4,208	1,003
Roseville High	3,159	4,328	1,169
<b>TOTAL</b>	<b>35,049</b>	<b>37,612</b>	<b>2,563</b>

Definition of "Unhoused"

Unhoused students represent a district's permanent capacity minus their existing enrollment. Those districts with surplus classroom space are shown as negative and those districts with overcrowded classroom space are shown as a positive. Unhoused students are housed in overcrowded classrooms, non-classroom space or in rented/leased portables.

- \* There are currently over 700, 9-12 students from the Rocklin Unified School District being housed at Roseville and Del Oro High Schools due to the Rocklin Unification.
- \*\* The surplus student classroom space occurs at the high school level only.

**TABLE IV**  
**SCHOOL DISTRICTS BY REGIONAL ANALYSIS AREA**

<b>Regional Area</b>	<b>School Districts</b>	<b>Grade Levels</b>
<b>Tahoe Basin</b>	Tahoe-Truckee Unified	K-12
<b>Sierra Resorts</b>	Tahoe-Truckee Unified	K-12
<b>Sierra</b>	Tahoe-Truckee Unified(Summit Area)	K-12
	Placer High S.D.	9-12
	Alta-Dutch Flat	K-8
	Emigrant Gap	K-8
	Colfax	K-8
<b>Lower Sierra</b>	Placer H.S.D.	9-12
	Foresthill	K-8
	Colfax	K-8
	Placer Hills	K-8
<b>Auburn Foothills</b>	Placer High S.D.	9-12
	Ackerman	K-8
	Auburn Union	K-8
	Penryn	K-8
	Ophir	K-8
	Newcastle	K-8
	Loomis Union	K-8
<b>South Placer</b>	Rocklin Unified	K-12
	Western Placer Unified	K-12
	Roseville High S.D.	9-12
	Eureka Union	K-8
	Roseville City	K-8
	Dry Creek	K-8
	Center Unified (Sacramento County)	K-12
	Grant Union (Sacramento County)	7-12
Elverta (Sacramento County)	K-6	

TABLE IV (continued)  
SCHOOL DISTRICTS BY REGIONAL ANALYSIS AREA

New Growth Areas		
<b>Villages of Dry Creek</b>	Roseville High S.D.	9-12
	Dry Creek	K-8
	Center Unified (Sac.)	K-12
	Grant Union (Sac.)	7-12
	Elverta (Sac.)	K-6
<b>Placer Villages</b>	Roseville High S.D.	9-12
	Roseville City	K-8
	Center Unified (Sac.)	K-12
<b>Stanford Ranch West</b>	Western Placer Unified	K-12
	Roseville High S.D.	9-12
	Roseville City	K-8
<b>Blickford Ranch</b>	Western Placer Unified	K-12
	Loomis Union	K-8
	Penryn	K-8
	Newcastle	K-8
	Placer High S.D.	9-12

The Sierra Community College District covers the entire County.

**TABLE V**  
**HOUSING UNITS**

Regional Area	Existing DUs (1)		New Dwelling Units (2)			
	SF	MF	2010 YR		2040 YR	
			SF	MF	SF	MF
Tahoe Basin	9,160	2,290	1,041	260	0	0
<b>Running Total</b>	<b>11,450</b>		<b>12,750</b>		<b>12,750</b>	
Sierra Resorts	1,710	665	390	135	500	0
<b>Running Total</b>	<b>2,375</b>		<b>2,900</b>		<b>3,400</b>	
Sierra	2,050	0	50	0	300	0
<b>Running Total</b>	<b>2,050</b>		<b>2,100</b>		<b>2,400</b>	
Lower Sierra	5,698	777	1,702	223	2,500	300
<b>Running Total</b>	<b>6,475</b>		<b>8,400</b>		<b>11,200</b>	
Auburn Foothills	8,894	2,656	4,306	1,344	3,000	3,556
<b>Running Total</b>	<b>11,550</b>		<b>17,200</b>		<b>21,100</b>	
South Placer	8,022	603	3,778	297	3,800	400
<b>Running Total</b>	<b>8,625</b>		<b>12,700</b>		<b>16,900</b>	
New Growth	0	0	8,500	2,100	17,000	4,300
<b>Running Total</b>	<b>0</b>		<b>10,600</b>		<b>31,900</b>	
	35,534	6,991	19,767	4,359	27,100	8,556

<b>OVERALL TOTALS</b>	<b>42,525</b>	<b>66,651</b>	<b>102,307</b>
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(1) Issues and Options, January 12, 1993, Table 2-3

(2) Countywide General Plan Draft EIR, October 1, 1993, Table 2-7

**Total Dwelling Units**

Existing	New DU 2010	New DU 2040
42,525	66,651	102,307

TABLE VI  
STUDENT GENERATION

Regional Area	DU	2,010				2,040				Total
		K-5	6-8	9-12	Total	K-5	6-8	9-12	Total	
Tahoe Basin	SF	393	146	245	784	0	0	0	0	784
	MF	33	12	12	57	0	0	0	0	57
Sierra Resort	SF	147	55	92	294	189	70	118	377	671
	MF	17	6	6	29	0	0	0	0	29
Sierra	SF	19	7	12	38	113	42	71	226	264
	MF	0	0	0	0	0	0	0	0	0
Lower Sierra	SF	573	239	396	1,208	944	352	581	1,877	3,085
	MF	28	10	10	48	38	14	13	65	113
Auburn Foothills	SF	1,626	607	1,017	1,208	944	352	581	1,877	3,085
	MF	170	63	60	293	451	167	158	776	1,069
South Placer	SF	1,426	533	892	2,851	1,435	536	897	2,868	5,719
	MF	38	14	13	65	51	19	18	88	153
New Growth	SF	3,209	1,198	2,008	6,415	6,419	2,397	4,144	12,960	19,375
	MF	267	99	93	459	546	202	191	939	1,398
<b>Totals</b>		<b>7,946</b>	<b>2,989</b>	<b>4,856</b>	<b>15,791</b>	<b>11,318</b>	<b>4,222</b>	<b>6,899</b>	<b>22,439</b>	<b>38,230</b>

Yield Rates = Students Per Dwelling Unit (DU)

Dwelling Units	K-5	6-8	9-12
Single Family (SF)	.3776	.1410	.2362
Multi Family (MF)	.127	.047	.0445

TABLE VII  
FACILITY NEEDS COSTS - COUNTYWIDE

SCHOOL COSTS

Type	Typical Size	Cost Per Student	Cost per School
K-5	600 (10 acre)	\$10,606	\$6,363,600
6-7-8	750 (18 acres)	\$14,108	\$10,581,000
9-12	1,600 (40 acres)	\$21,071	\$33,713,600

SCHOOL SITE NEEDS COUNTYWIDE

2,010 YEAR

k-5	7,946 students ÷ 600	=	13.24
6-8	2,989 students ÷ 750	=	3.98
9-12	4,856 students ÷ 1600 (324 acres)	=	3

2,040 YEAR

k-5	11,318 students ÷ 600	=	18.86
6-8	4,222 students ÷ 750	=	5.6
9-12	6,899 students ÷ 1600 (461.4 acres)	=	4.3

TOTAL (2,010 + 2,040)

K-5	19,264 students ÷ 600	=	32.10
6-8	7,211 students ÷ 750	=	9.6
9-12	11,755 students ÷ 1600	=	7.35

School Facility Costs

<b>2010</b>	<b>k-5</b>	<b>6-8</b>	<b>9-12</b>
Number of students	7,946	2,989	4,856
Cost per student	\$10,606	\$14,108	\$21,071
Total Cost	\$84,275,276	\$42,168,812	\$102,320,776
<b>2040</b>	<b>K-5</b>	<b>6-8</b>	<b>9-12</b>
Number of Students	11,318	4,222	6,899
Cost per student	\$20,606	\$14,108	\$21,071
Total Cost	\$120,038,708	\$59,563,976	\$145,368,829
<b>Totals</b>	<b>K-5</b>	<b>6-8</b>	<b>9-12</b>
Number of Students	19,264	7,211	11,755
Cost per student	\$10,606	\$14,108	\$21,071
Total Cost	\$205,374,584	\$101,732,788	\$247,689,605

K-5	32.1 sites	\$205,374,584
6-8	9.6 sites	\$101,732,788
9-12	7.35 sites	\$247,689,605
<b>Total</b>	<b>49 sites</b>	<b>\$544,796,977</b>

**TABLE VIII**  
**DEVELOPER FEE INCOME**

- **Square Footage Analysis**

Assumes            1800 square feet per SF DU  
                             750 square feet per MF DU

<u>2010</u>	<u># of Units</u>	<u>Square Feet</u>	<u>Total Square Feet</u>
	19,767 SF x	1,800 =	35,580,600
	4,359 MF x	750 =	3,269,250
 <u>2040</u>	 <u># of Units</u>	 <u>Square Feet</u>	 <u>Total Square Feet</u>
	27,100 SF x	1,800 =	48,780,000
	8,556 MF x	750 =	6,417,000
 <u>TOTAL</u>	 <u># of Units</u>	 <u>Square Feet</u>	 <u>Total Square Feet</u>
	46,767 SF x	1,800 =	84,180,600
	12,915 MF x	750 =	<u>9,686,250</u>
	Total Square Footage		93,866,850

- **Developer Fee Income**

Government Code 58030 Fee \$1.65/sq. ft. for residential

93,866,850 sq. ft. x \$1.65 = \$154,880,302

Government Code 58030 Fee \$.27/sq. ft. for commercial/industrial

60,774,000 sq. ft. x \$ .27 sq. ft. = \$16,408,900

SB 1287 Fee \$1.00 /sq. ft.

93,866,850 sq. ft. x \$1.00 = \$93,866,850

(Taken from Table 2-8 of the draft)

**Total State Developer Fees**

	<b>Proposition 170 Approved</b>	<b>Proposition 170 Denied</b>
<b>58030 Fee Residential</b>	\$154,880,302	\$154,880,302
<b>58030 Fee Com./Ind.</b>	16,408,900	16,408,900
<b>SB 1287</b>	<u>93,866,850</u>	<u>-0-</u>
	\$265,156,058	\$171,289,202
<b>Total Facility Needs</b>	\$544,796,977	\$544,796,977
<b>Fees Generated</b>	\$265,156,058	\$171,289,202
<b>Shortfall</b>	\$279,640,919	\$373,507,775

↑  
B-1-2  
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**B-2 Center Unified School District (10/13/93)**

B-2-1. *Draft Plan* should incorporate policy originally proposed by County Office of Ed in 9/24/93 letter

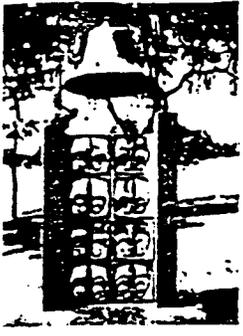
*Refer to common response #7.*

B-2-2. Analysis of school impacts should be added to Final EIR

*Refer to common response #7.*

B-2-3. Analysis provided by Placer County Office of Ed does not cover all of Center Unified; additional analysis will be provided

*Comment noted.*



# Center Unified School District

8408 Watt Avenue • Elverta, California 95626  
Telephone (916) 338-6400 • FAX (916) 338-6411

SUPERINTENDENT  
Rex Fortune, Ph.D.

BOARD OF TRUSTEES  
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Jo Teel  
Gail L. Kieve  
Anita L. Westenbarger

October 13, 1993

PLACER COUNTY  
DATE RECEIVED

OCT 14

PLANNING COMMISSION

Mr. Loren Clark  
Placer County Planning Department  
11414 B Avenue  
Auburn, CA 95603

Dear Mr. Clark:

Thank you for the opportunity to comment on the Placer County Draft General Plan and Draft Environmental Impact Report (EIR). As a public agency that is potentially affected by the adoption of the plan and EIR, we are very concerned about several issues regarding school facilities and offer the following comments. We also reserve the right to make additional written comments within the public comment period.

Center Unified is a highly impacted and fast-growing school district. The school district is already overcapacity, having had to lease approximately 100 portable classrooms in order to house our growing enrollment. Center Unified will be additionally impacted by at least two new growth areas included in the General Plan and EIR: Villages of Dry Creek and Placer Villages.

### Comments Concerning the General Plan Draft Policy Document

1. We support the policy statements included in the Draft Policy Document, under Section 4, Public Facilities and Services, and specifically in the Schools section, with the addition of #2 below.
2. We recommend that the facilities funding policy submitted to you in a September 24, 1993 letter by Mr. Jim Bush of the Placer County Office of Education be added to the schools section. This policy statement is:

"Proposed County general plan amendment(s), rezoning(s), rezoning(s), and other legislative act(s) to allow residential developments, shall not be approved if it is documented by the affected school district to the satisfaction of the Planning Commission/Board of Supervisors that adequate school facilities cannot be made available concurrently with the need for such facilities."

B-2-1

Mr. Loren Clark  
Placer County Draft General Plan and EIR  
October 14, 1993  
Page Two

It is our interpretation that the passage of Senate Bill 1287 last year does not preclude cities and counties from considering the impact on the provision of adequate school facilities in the decision to approve new residential development, and does not preclude cities and counties from adopting mitigation measures which would require development projects to participate in financing plans for school facilities.

B-2-1

In addition, this recommended policy statement is supported by the statement on page 24, Basic Planning Standards for New Growth Areas, Item Number 6, which states that new growth areas "shall be designed and constructed to provide all public infrastructure.... including... school and medical facilities where warranted by population..." Fiscal impact analyses and financing plans included in specific area plans should include impact and cost of needed new school facilities.

#### Comments concerning the Draft Environmental Impact Report

1. Please explain why school facilities impacts and mitigation measures are not included in the EIR. Mr. Jim Bush of the Placer County Office of Education has submitted such an analysis, which we recommend be included into the EIR in order to provide a full analysis of impact on public services as required by law. The General Plan clearly acknowledges that new residential growth planned for in the General Plan will have an impact on school districts' abilities to provide adequate school facilities. Goal 4.J, and policy statements 4.J.1., 4.J.6., 4.J.10, and 4.J.11. in the Policy Document all acknowledge the essential nature of school facilities as part of the public infrastructure needed to serve new residential development.

B-2-2

In addition, Goal 4.B. and Policies 4.B.1. and 4.B.2. in the Policy Document clearly state that the County shall require the new development pay its fair share of the cost of all facilities it uses based on the demand caused by the new development.

#### Facilities Analysis

Mr. Jim Bush of the Placer County Office of Education has prepared a school facilities analysis, which, as we mentioned previously, we recommend to be incorporated in its entirety, into the EIR. While the school facilities analysis encompasses the entire Placer County, it does not include specific enrollment and facility information for Center Unified School District. This is because Center Unified School District is located in both Sacramento County and Placer County, but is served by the Sacramento County Office of Education. For that reason, I will be submitting additional facilities analysis information to you for inclusion into the EIR.

B-2-3

Mr. Loren Clark  
Placer County Draft General Plan and EIR  
October 14, 1993  
Page Three

Please contact Ms. Leigh A. Coop, Director of Facilities, Center Unified School District, (916) 338-6337 if you have questions or need additional information.

Thank you for your consideration of these comments.

Sincerely,



Leigh A. Coop  
Director of Facilities

cc: Dr. Rex Fortune, Superintendent, CUSD  
Doug Smith, Business Manager, CUSD  
Marion Cantor, Atty.  
Mike Winters, Caldwell, Winters, Flores  
Jim Bush, Placer County Office of Education

**B-3 Loomis Union School District (10/15/93)**

B-3-1. *Draft Plan* should incorporate policy originally proposed by County Office of Ed in 9/24/93 letter

*Refer to common response #7.*

B-3-2. Analysis of school impacts provided by County Office of Education should be added to Final EIR

*Refer to common response #7.*

# Loomis Union School District

P.O. Box 104, Loomis CA 95650 (916) 652-1800

*Building Excellence in Education Since 1856*

Charles Emerson, Superintendent

October 15, 1993

PLACER COUNTY  
DATE RECEIVED

OCT 19 1993

PLANNING DEPARTMENT

Kirk Uhler  
Placer County Board of Supervisors  
175 Fulweiler Avenue  
Auburn, CA 95603

Dear Kirk:

The Loomis Union School District would like to thank the Placer County Planning Commission for allowing school districts throughout the county to have the opportunity to provide input into the Draft General Plan Policy Document and the Draft Environmental Impact Report.

The Loomis Union School District agrees with these proposed policies and, in addition, would like to request the inclusion of one additional policy that was suggested earlier.

"Proposed County general plan amendment(s), rezoning(s), rezoning(s) and other legislative acts to allow residential developments shall not be approved if it is documented by the affected school district to the satisfaction of the Planning Commission/Board of supervisors that adequate school facilities cannot be made available concurrently with the need for such facilities."

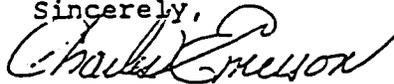
B-3-1

It was further noted that no school impacts were analyzed in the Environmental Impact Report. The Loomis Union School District would like to request that the analysis, including mitigation measures prepared by Jim Bush, District Facility Planner, be placed in the Draft Environmental Impact Report. Without these proposed mitigation measures, the Loomis Union School District will be significantly impacted as a result of the approval of the Draft General Plan.

B-3-2

Your consideration of these requests will be greatly appreciated.

Sincerely,



Charles Emerson  
District Superintendent

cc: Phil Ozenick, Chairman Board of Supervisors  
Fred Yeager, Director Placer County Planning Department  
BOARD OF TRUSTEES • VIVIAN ADAMS • BRUCE BUCHHOLZ • WIL CONNER • NYLE KELLER • CAROLE MCCARTHY

Franklin School  
7050 Franklin School Rd.  
Ann Leonard, Principal

Loomis School  
3505 Taylor Road  
Glenn Lockwood, Principal  
(916) 652-1824

Placer School  
8650 Horseshoe Bar Rd.  
Joe Silva, Principal  
(916) 652-1830

**B-4 Eureka Union School District (10/18/93)**

B-4-1. *Draft Plan* should incorporate policy originally proposed by County Office of Ed in 9/24/93 letter

*Refer to common response #7.*

B-4-2. Analysis of school impacts provided by County Office of Education should be added to Final EIR

*Refer to common response #7.*

B-4-3. General Plan must include mitigation programs to ensure good schools

*Refer to common response #7.*

TRUSTEES  
SHEILA ANDERSON  
DAN CLIFT  
LAURIE DIEFENBACH  
JOHN TANNER  
REVÉ TAYLOR

# Eureka Union School District

5477 EUREKA ROAD  
GRANITE BAY, CALIFORNIA 95746  
PLACER COUNTY

RONALD L. FEIST, Ed. D  
District Superintendent  
District Office - 791-4939  
FAX 791-5527  
DAVID R. FREEMAN  
Assistant Superintendent  
District Office - 791-4939  
FAX 791-5527

October 18, 1993

PLACER COUNTY  
DATE  
RECEIVED

OCT 22 1993

Mr. Kirk Uhler  
Supervisor District 4  
Placer County Board of Supervisors  
175 Fulweiler Avenue  
Auburn, CA 95603

PLANNING DEPARTMENT

RE: Draft General Plan Policy Document and Draft E.I.R.

This past week I had the opportunity to attend the Placer County Planning Commission to discuss the Draft General Plan Policy Document and the Draft E.I.R. I left that meeting with some views I feel are important to share with you because you represent the Eureka Union School District on planning issues.

- (1) We appreciate the efforts of the Planning Staff, especially Fred Yeager and Loren Clark for giving the school districts of Placer County an opportunity to provide significant input on the draft policies. The Eureka Union School District worked actively on the Granite Bay Community Plan Schools' Component and highly supports the proposed school policies in the Draft General Plan. However, one policy needs to be added to the general plan.

"Proposed County general plan amendment(s), rezoning(s), rezoning(s) and other legislative acts to allow residential developments shall not be approved if it is documented by the affected school district to the satisfaction of the Planning Commission/Board of Supervisors that adequate school facilities cannot be made available concurrently with the need for such facilities."

B-4-1

Letter to Kirk Uhler - Supervisor District 4

October 18, 1993

Page 2

(2) The Draft E.I.R. does not analyze school impacts that will develop because of the adoption and implementation of the new General Plan. Failure to not include a public service as important as schools is a serious mistake in an E.I.R. process. Jim Bush, Facilities Director for Placer County Office of Education provided to the Planning Commission and Planning Staff a copy of an analysis of the proposed General Plan impacts on school districts. This analysis includes potential increases of the number of students and the obvious need for additional school facilities. The document established costs associated with the impacts and some measures available to mitigate the impacts. I highly recommend that Mr. Bush's "School Needs Analysis for the Placer County General Plan" be included in the Draft E.I.R. Jim's work represents data and input from the 19 school districts in Placer County and must become part of the planning considerations.

B-4-2

(3) For the eleven plus years I have been Superintendent of the Eureka Union School District, Placer County Planning Staff, Planning Commission and Board of Supervisors have worked in harmony with school districts to understand and help mitigate the school facilities' problems brought about by growth. Growth is healthy, but it must be managed and properly anticipated. Builders and developers in the Granite Bay/East Roseville area clearly understand and have been very supportive of the efforts to keep adding school facilities as new housing units come on line. Good schools sell houses, is a mutual benefit all parties clearly understand in the Eureka Union School District. The General Plan must support each district working with their community, including developers/builders to develop and implement a mitigation program for school facilities that works for everyone's benefit. Failure to have proper mitigation programs for schools in place will lead to a poor business climate for the real estate industry.

B-4-3

Letter to Kirk Uhler - Supervisor District 4  
October 18, 1993  
Page 3

Thank you for your consideration of my recommendations. Please feel free to give me a call or set up a meeting if you need additional information or clarification. Placer County's future depends upon good schools. All of us must work together to make sure Placer continues as one of the premier counties in education.

Sincerely,



Ronald L. Feist, Ed.D.  
District Superintendent  
EUREKA UNION SCHOOL DISTRICT

RLF:lit

cc: Eureka Board of Trustees  
Mr. Phil Ozenick, Chairperson, Board of Supervisors  
Mr. Fred Yeager, Planning Director  
Mr. Jim Bush, PCOE Facilities Director

**B-5 Sierra College (10/20/93)**

B-5-1. Sierra College agrees with *Draft Plan* policy relating to higher education

*Comment noted; no response necessary.*

B-5-2. Final EIR should analyze impact on college facilities and identify new Sierra College site of 100 acres in Placer Villages area

*The Final EIR includes a discussion of school impacts (see common response #7), but the County does not feel it is appropriate to designate school sites at the level of specificity requested. Furthermore, the Placer Villages Specific Plan Area no longer appears on the Land Use Diagram.*

# SIERRA COLLEGE

• 5000 Rocklin Road • Rocklin CA 95677 • Tel. 916-781-0540 •

October 20, 1993

**RECEIVED**  
OCT 27 1993  
BOARD OF SUPERVISORS

DATE 10-27-93  
 Board of Supervisors - 5  
 John Marin  
 Don Lundford  
 Chair of the Board  
A. T. Perkins

Phil Ozenick, Chairman  
Placer County Board of Supervisors  
175 Fulweiler Avenue  
Auburn, CA 95603

Dear Phil:

Thank you for the opportunity to provide comments on the Draft County General Plan Policy Document and Draft Environmental Impact Report (EIR).

In the Draft Policy Document under higher education, it reads "the County shall work with Sierra College to ensure that higher education programs and facilities are available to Placer County." The College certainly agrees with this policy and the County's support. As you know, Sierra College not only provides a higher educational opportunity for Placer County residents but also provides extensive job training, small business development, and computer-aided manufacturing training, all of which help to stimulate the economy.

B-5-1

In regards to the Draft EIR, I feel it is important to include in this document, the impact upon college facilities expected as a result of implementation of the General Plan. It is anticipated that the unincorporated area of the County will produce approximately 16,000 new Sierra College students. Existing facilities will not accommodate these students. It is requested that a college center site (up to 100 acres) be designated in the Placer Villages area. This site would serve the west Roseville, Dry Creek, and Placer Villages areas and the entire Antelope area of Sacramento County which is part of the District.

B-5-2

Thank you again for this opportunity.

Sincerely,

Kevin M. Ramirez, Ed.D.  
President/District Superintendent

cc: Fred Yeager, County Planning Director

Dr. KEVIN M. RAMIREZ  
President & District Superintendent

**RECEIVED**  
OCT 27 1993

Board of supervisors (5)  
 John Marin  
 County Executive  
 County Counsel  
 Planning  
 Public Works  
 Environmental Health  
 Clerk of the Board  
 File  
For: General Plan  
Date: 11/1/93

**B-6 Tahoe Truckee Unified School District (10/20/93)**

B-6-1. *Draft Plan* should incorporate policy originally proposed by County Office of Ed in 9/24/93 letter

*Refer to common response #7.*

B-6-2. Analysis of school impacts provided by County Office of Education should be added to Final EIR

*Refer to common response #7.*

PLACER COUNTY  
DATE RECEIVED  
OCT 21 1993  
NGV 01 1993  
CLERK OF THE



- Board of Supervisors (2)
- John Marin
- County Executive
- County Counsel
- Planning
- Public Works
- Environmental Health
- Clerk of the Board
- File

Placer Co. Gen. Plan Update

PLANNING DEPARTMENT  
**Tahoe Truckee Unified School District**  
Vincent C. Deveney, Superintendent      Terre D. Krause, Assistant Superintendent

October 20, 1993

- DATE 10-26-93
- Board of Supervisors - 5
  - John Marin
  - Don Lunsford
  - Clerk of the Board
  - Planning

RECEIVED  
OCT 26 1993

Kirk Uhler  
Placer County Board of Supervisors  
175 Fulweiler Avenue  
Auburn, CA 95603

BOARD OF SUPERVISORS

Dear Mr. Uhler:

The Tahoe Truckee Unified School District would like to take this opportunity to provide input to the Draft General Plan Policy Document and the Draft E.I.R. Report.

The Tahoe Truckee Unified School District and its Board of Trustees appreciate the opportunity to respond to both of these documents on behalf of its students and staff. Our district feels strongly that a school's component be established in these documents and that it is imperative that these documents reflect the evergrowing school community and its populations. Our district respectfully requests your consideration of the following:

We request that our previous request for a statement of policy regarding schools be included. That previous policy request is worded as follows:

"Proposed County General Plan Amendment(s), pre-zoning(s), rezoning(s) and other legislative acts to allow residential developments shall not be approved if it is documented by the affected school district to the satisfaction of the Planning Commission/Board of Supervisors that adequate school facilities cannot be made available concurrently with the need for such facilities."

Additionally;

The Draft E.I.R. responses prepared by Mr. Jim Bush on behalf of our school district were not included and responded to in the Draft E.I.R. We respectfully request that these school analysis including the appropriate mitigation measures be placed in the Draft E.I.R.

B-6-1

B-6-2

BOARD OF TRUSTEES: Debra Darby, Cliff Hartwell, Nancy O'Neill, Jim Wallis, John Wojcik

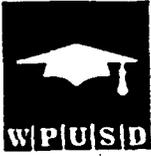
**B-7 Western Placer Unified School District (10/20/93)**

B-7-1. *Draft Plan* should incorporate policy originally proposed by County Office of Ed in 9/24/93 letter

*Refer to common response #7.*

B-7-2. Analysis of school impacts provided by County Office of Education should be added to Final EIR

*Refer to common response #7.*



October 20, 1993

**WESTERN  
PLACER  
UNIFIED  
SCHOOL  
DISTRICT**

630 6th Street  
Lincoln, CA 95648

(916) 645-6350  
(916) 645-6356 FAX

Superintendent  
Kenneth E. Sanders

Board of Trustees  
Judy Campbell  
Rhynie Hollitz  
Karen Roberts  
Sid Tetley  
Glenn Vineyard

Phil Ozenick, Chairman  
Placer County Board of Supervisors  
175 Fulweiler Avenue  
Auburn, CA 95603

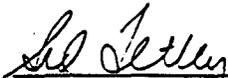
We would like to express our concern regarding the Draft General Plan Policy Document and the Draft Environmental Impact Report. The proposed policies of the planning staff addresses the issue of adequate school facilities as growth occurs and we especially appreciate the efforts that Fred Yeager and Loren Clark put into this effort.

The document would be strengthened if it included the following language:

"Proposed County general plan amendment(s), rezoning(s), rezoning(s) and other legislative acts to allow residential developments shall not be approved if it is documented by the affected school district to the satisfaction of the Planning Commission/Board of Supervisors that adequate school facilities cannot be made available concurrently with the need for such facilities."

We believe Jim Bush has provided excellent analysis and school mitigation measures that need to be included in the Draft Environmental Impact Report. Without these considerations the proposed mitigation measure will impact the Western Placer Unified School District in a negative manner.

B-7-1  
B-7-2

  
\_\_\_\_\_  
Sid Tetley, President  
Board of Trustees  
Western Placer Unified School District

  
\_\_\_\_\_  
Ken Sanders, Superintendent  
Western Placer Unified School  
District

KS,ST/em

cc: Fred Yeager, Director ✓  
Placer county Planning Department  
Jim Bush, Placer County Office of Education

bdsupvr

"PURSUIT OF EXCELLENCE"

**B-8 Sage Institute (Dry Creek Elementary) (10/21/93)**

- B-8-1. Requests that same policies, procedures, and conditions adopted in Dry Creek-West Placer Plan be added to Draft Countywide Plan

*The language contained in the Draft Policy Document, except for the one policy change described in common response #7, has not changed. Ultimately, the policies and programs of the Dry Creek/West Placer Community Plan will be modified to be consistent with the countywide policies in any such changes are deemed necessary.*

**SAGE INSTITUTE, INC.**  
 29800 Agoura Road, Suite 220  
 Agoura Hills, California 91301  
 (805) 497/8557 or (818) 991/0646  
 fax (818) 991-0754

**MEMORANDUM**

**TO:** Loren Clark  
 Placer County Planning Department

**FROM:** Dr. Joel Kirschenstein, President  
 Ms. Irma Tucker, Senior Associate  
 Sage Institute, Incorporated

**DATE:** October 21, 1993

**SUBJECT:** General Plan Update

On behalf of the Dry Creek Joint Elementary School District ("District"), we would like to bring to the Planning Commission's attention that we were not in attendance at the General Plan Update hearing on October 14, 1993.

By way of follow-up, please be advised that the District wishes to have the same policies, procedures and conditions in place that were adopted by the Board of Supervisors on May 14, 1990 per Resolution No. 90-181 as part of the Public Services Element of the Dry Creek-West Placer Community Plan ("Community Plan"). Attached hereto for your reference is an excerpt from the Education/Schools Component of the Public Services Element of the Community Plan which sets forth the adopted Goals, Policies and Implementation Measures pertaining to public schools.

B-8-1

We will be in attendance at future Planning Commission and Board of Supervisors meetings to clarify this issue and present testimony on behalf of the District.

**Attachment**

cc: Kelvin Lee, District Superintendent  
 Board of Trustees

b:\dcrs04\lspuclark

provide a short-term water supply until the long-term water supply project can be completed. The short-term water supply would include:

- . Use of the extra capacity of an expanded Water Treatment Plant in order to supply treated water to the Plan area through the proposed intertie between the PCWA and City of Roseville water systems.
- . Conjunctive use of groundwater in the Plan area in order to meet peak demands. (West Roseville Public Facilities Plan - January 1989)

#### Education - Schools

##### GOALS

1. TO PROVIDE THE MOST TIMELY AND BEST POSSIBLE EDUCATIONAL FACILITIES TO THE RESIDENTS OF THE PLAN AREA.
2. TO CONSTRUCT NEW SCHOOLS TO MEET CURRENT NEEDS AND AS THEY ARE NEEDED TO AVOID EVEN TEMPORARY OVERCROWDING WHEREVER POSSIBLE.
3. TO MINIMIZE THE NEED FOR BUSSING AND TO INCREASE THE SAFETY OF CHILDREN GOING TO AND FROM SCHOOL THROUGH THE PROPER LOCATION OF SCHOOL FACILITIES.
4. TO ESTABLISH SCHOOL DISTRICT BOUNDARIES WHICH BEST SERVE THE NEEDS OF THE STUDENTS IN THE AREA.

##### Policies

1. County, developer, and school district personnel should continue to work together closely to monitor population increases in the area and to ensure that new school facilities are provided as needed. Adequate school facilities must be shown to be available, in a timely manner, before approval will be granted to new residential development including subdivisions, rezonings, and General Plan Amendments.
2. New development in the area must, along with the State of California, continue to provide the funding necessary to meet the demand for new school facilities in a timely manner.

3. New school sites should be centrally located within areas of the highest population densities, and where roads and pedestrian paths provide the safest access to the sites. These sites should be separated and buffered from commercial and industrial properties and from major roads.
4. Joint use of school facilities for recreation and other public uses which do not conflict with the primary educational use are to be encouraged.
5. Levy developer impact fees to the fullest extent possible and, if necessary in order to meet the school needs in this area, create other appropriate funding mechanisms to ensure that the goals and policies of this Plan are met.
6. Designate future school sites on the Plan area map, identified by general location, type, size requirements, and likelihood of development.
7. Encourage continued use of educational programs in schools, service clubs, industry, etc. to foster public awareness of local fire and safety hazards, the benefits of agriculture in Placer County and California, and the need to identify and protect a community's unique natural and cultural resources.

#### Discussion/Implementation

The Plan area is served by several different school districts. These include the Dry Creek Joint Elementary School District, the Elverta Joint Elementary School District, the Center Unified School District, the Roseville Joint Union High School District, and the Grant Union High School District. (See map in E.I.R. for district boundaries.)

New development in the area will heavily impact the Roseville High, Dry Creek, and Center Unified School Districts. The Grant Union and Elverta School Districts will be less impacted due to the lack of any increase in densities proposed for the portion of the Plan area included within those two districts.

Approximately 70% of the proposed residential units, included in the Plan, fall within the Dry Creek School District boundaries. The school district (through their consultant, Sage Institute Inc.) has provided the following information for consideration in the Dry Creek - West Placer Plan. Upon applying student yield and facility size criteria against the proposed housing inventory, it is projected that two elementary schools and one middle school will be required to house students at total buildout of the Plan area.

#### Site Location and Size Criteria

The following general criteria should be applied in designating school facilities within the Community Plan:

1. Sites should be centrally located within proposed single family developments.
2. Size requirements are ten useable acres for elementary school and eighteen to twenty useable acres for middle schools, on flat terrain.
3. Site should not be adjacent to major roadways, thoroughfares, commercial or industrial areas.
4. Development tracts and street systems should be designed to accommodate school bus pick-up, drop-off and turnaround areas.
5. Maximize joint use opportunities by locating school facilities adjacent to or in close proximity to park sites, public open space, community buildings and other public recreation facilities.
6. Schools should be linked to planned pedestrian and/or bikeway path systems.

#### Site Acquisition Mechanisms and Incentives

The following are among the vehicles which have been successfully used by School Districts and local planning jurisdictions to facilitate the provision of needed school sites.

1. Dedication of land by developer.

2. Condemnation by school district (in some instances this can provide tax benefits to the property owner or developer).
3. Encourage cooperative site acquisitions and joint use arrangements between the District and other public or quasi-public agencies.
4. Negotiation of lease/purchase agreements between the school district and property owners/developers.
5. To allow for continued residential development only where adequate allowance has been made for the timely provision of public school facilities.

#### Financing Programs

Subsequent to the approval of a Community Plan Land Use Map, and prior to finalizing the implementing zoning regulations, a comprehensive finance plan will need to be developed which takes into consideration the following opportunities:

1. Development and Building Permit fees, of which a predetermined portion shall accrue to the School District.
2. Assessment districts, such as the formation of a Hello-Roos community Facilities District to fund school facilities and other infrastructure.
3. School construction bonds.
4. State School Building Program assistance.
5. Other mechanisms as may be applicable.

A detailed financial analysis will be undertaken and presented to the County by the Dry Creek School District upon the selection of the recommended land use plan. (The proposed Public Facilities Plan School component is included as a separate appendix to this Plan.)

Of significance to the financing plan is the fact that the California State School Building Program has depleted its financial resources and therefore School Districts can expect little, if any, State funding assistance in the years to come. As a result, School Districts and local jurisdictions must find alter-

**B-9 Placer Hills Union School District (10/25/93)**

B-9-1. *Draft Plan* should incorporate policy originally proposed by County Office of Ed in 9/24/93 letter

*Refer to common response #7.*

B-9-2. Analysis of school impacts provided by County Office of Education should be added to Final EIR

*Refer to common response #7.*

Placer Hills Union School District

Ken Poulsen  
Superintendent

PLACER COUNTY  
DATE  
RECEIVED

P.O. Box 68  
Meadow Vista, CA 95722  
(916) 878-2606  
FAX (916) 878-2663

OCT 25 1993  
October 25, 1993

PLANNING DEPARTMENT

Mr. Rex Bloomfield  
Supervisor, District 5  
Placer County Board of Supervisors  
175 Fulweiler Street  
Auburn, Ca. 95603

Dear Rex:

On behalf of the Placer Hills Union School District, we would like to thank you for your support of schools and education, what I consider to be the cornerstone of this nation and the fate of our future.

In addition, we would like to inform you of the wonderful support we have received by the Planning Department staff, especially Fred Yeager and Loren Clark. They have allowed significant school district impact to be included in the draft policies, which we believe are not only well done, and appropriate, but essential for us to continue educating children. We are not sure for what reason, but one important policy was not included. This is a critical policy and we would ask that it be included. The policy reads as follows:

B-9-1

*"Proposed County general plan amendment(s), rezoning(s), rezoning(s) and other legislative acts to allow residential developments shall not be approved if it is documented by the affected school district to the satisfaction of the Planning Commission/Board of Supervisors that adequate school facilities cannot be made available concurrently with the need for such facilities."*

In regards to the Draft EIR, there were no school impacts analyzed. We have read those prepared by Jim Bush and propose an additional request to include his analysis, including mitigation measures, in the Draft EIR. As shown in the analysis, you can see the Placer Hills Union School District will be significantly impacted as a result of the EIR if proposed mitigation measures are not included.

B-9-2

We believe the more information that can be documented regarding the current and future impacts on schools will help to provide a clearer understanding of our serious situation.

Mr. Rex Bloomfield

- 2 -

October 25, 1993

Again, thanks for your support and if we can answer any questions or be of any further assistance, please don't hesitate to contact us.

Sincerely



Ken Foulson  
Superintendent



Norma Taylor  
Board of Trustees President

cc: Mr. Phil Ozenick, Chairman, Board of Supervisors  
✓ Mr. Fred Yeager, Planning Dept.  
Mr. Loren Clark, Planning Dept.  
Mr. Jim Bush, PCOE

KP:km

**B-10 Roseville Joint Unified High School District (10/25/93)**

B-10-1. *Draft Plan* should incorporate policy originally proposed by County Office of Ed in 9/24/93 letter

*Refer to common response #7.*

B-10-2. Analysis of school impacts should be added to Final EIR

*Refer to common response #7.*



## Roseville Joint Union High School District

1750 CIRBY WAY, ROSEVILLE, CALIFORNIA 95661 • (916) 786-2018 • FAX (916) 786-2681

ROBERT J. TOMASINI, Superintendent

BOARD OF TRUSTEES  
 ALLAN CAMERON  
 JIM GARDNER  
 CAROL HAMEL  
 JAMES JOINER  
 GARY A. KIDDER, Jr

October 25, 1993

Larry Sevison, Chairman  
 Placer County Planning Commission  
 11414 B Avenue  
 Auburn, CA 95603

**SUBJECT: PLACER COUNTY GENERAL PLAN UPDATE AND  
 ENVIRONMENTAL IMPACT REPORT**

Dear Mr. Sevison:

Thank you for the opportunity to respond to the Countywide General Plan Draft Policy Document and associated Draft Environmental Impact Report. The District would like to thank the Planning staff for allowing Placer County school districts to have such an active role in the development of the policy statements. In particular, Mr. Yeager and Mr. Clark have worked very closely with Jim Bush of the Placer County Office of Education. Mr. Bush's proposals and comments are fully supported by the Roseville Joint Union High School District.

Please accept the following comments from the Roseville Joint Union High School District:

### Draft Policy Document

Since 1988, the County and the District have worked very closely to ensure that provisions for new school facilities are made as development occurs. The Roseville Joint Union High School District continues to be impacted by new development. Based upon currently adopted General Plans, three (3) new comprehensive high schools, two (2) continuation high schools, and one (1) opportunity high school will be needed. The cost of construction is estimated to be approximately \$111 million. Money generated through development agreements, developer fees, and bond proceeds will not create sufficient revenue to offset costs.

One very important policy has been excluded from the Draft Policy Document. It is recommended that the following policy be added:

B-10-1

Larry Sevison  
Placer County Planning Commission  
October 25, 1993  
Page 2

"Proposed County General Plan Amendment(s), Prezoning(s), rezoning(s), and other legislative acts to allow residential developments shall not be approved if it is documented by the affected school district to the satisfaction of the Planning Commission/Board of Supervisors that adequate school facilities cannot be made available concurrently with the need for such facilities."

B-10-1

Without this policy, the District's ability to provide facilities to adequately serve students generated from new development will be severely impacted.

Draft Environmental Impact Report

There is no discussion of school impacts or mitigation measures in the Draft Environmental Impact Report. Such impacts are required to be discussed under the California Environmental Quality Act (CEQA), and should be included as a component of any discussion on public services and facilities.

B-10-2

Thank you again for the opportunity to respond.

Sincerely,

*Robert J. Tomasini*

Robert J. Tomasini  
Superintendent

cc: Board of Trustees  
Placer County Board of Supervisors  
Jim Bush, PCOE

**B-11 Sage Institute (Dry Creek Elementary) (10/29/93)**

- B-11-1. Requests that policies, procedures, and conditions adopted in Dry Creek-West Placer Plan and EIR be added to Draft Countywide Plan

*The language contained in the Draft Policy Document, except for the one policy change described in common response #7, has not changed. Ultimately, the policies and programs of the Dry Creek/West Placer Community Plan will be modified to be consistent with the countywide policies in any such changes are deemed necessary.*

*Sage Institute Incorporated*

29800 Agoura Road, Suite #220  
Agoura Hills, California 91301

October 29, 1993

*Public Policy*  
*Master Planning*  
*Finance*  
*Asset Management*  
*Entitlements*

Placer County Planning Commission  
Auburn, California

Subject: Placer County General Plan Update

Dear Honorable Chairman and Members of the Planning Commission:

On behalf of the Dry Creek Joint Elementary School District ("District"), we would like to thank you for the opportunity to participate in the planning effort for the County-wide General Plan Update and Draft Environmental Impact Report.

On May 14, 1990, the Placer County Board of Supervisors adopted the Dry Creek / West Placer Community Plan ("Community Plan"). Included in the Public Service Element of the Community Plan is the Education - Schools component which sets forth specific Goals, Policies and Implementation Measures pertaining to schools (attached hereto as Exhibit A).

The District wishes to have the same Goals, Policies and Implementation Measures pertaining to public schools incorporated into the County-wide General Plan Update and related Environmental Impact Report that were adopted by the Board of Supervisors as part of the Community Plan.

The District administration and District Consultant, Sage Institute, Inc., both look forward to the on-going cooperative working relationship with Placer County in formulating the final County-wide General Plan and related Environmental Impact Report.

Respectfully,

Irma Tucker, Senior Associate  
Sage Institute, Inc.

On Behalf of Dry Creek Joint Elementary School District

Attachment

cc: Kelvin Lee, District Superintendent  
Dry Creek School District Board of Trustees

a:dewp2/plancom.hnd

(805) 497-8557 (818) 991-0646 fax (818) 991-0754

provide a short-term water supply until the long-term water supply project can be completed. The short-term water supply would include:

- . Use of the extra capacity of an expanded Water Treatment Plant in order to supply treated water to the Plan area through the proposed intertie between the PCWA and City of Roseville water systems.
- . Conjunctive use of groundwater in the Plan area in order to meet peak demands. (West Roseville Public Facilities Plan - January 1989)

#### Education - Schools

##### GOALS

1. TO PROVIDE THE MOST TIMELY AND BEST POSSIBLE EDUCATIONAL FACILITIES TO THE RESIDENTS OF THE PLAN AREA.
2. TO CONSTRUCT NEW SCHOOLS TO MEET CURRENT NEEDS AND AS THEY ARE NEEDED TO AVOID EVEN TEMPORARY OVERCROWDING WHEREVER POSSIBLE.
3. TO MINIMIZE THE NEED FOR BUSSING AND TO INCREASE THE SAFETY OF CHILDREN GOING TO AND FROM SCHOOL THROUGH THE PROPER LOCATION OF SCHOOL FACILITIES.
4. TO ESTABLISH SCHOOL DISTRICT BOUNDARIES WHICH BEST SERVE THE NEEDS OF THE STUDENTS IN THE AREA.

##### Policies

1. County, developer, and school district personnel should continue to work together closely to monitor population increases in the area and to ensure that new school facilities are provided as needed. Adequate school facilities must be shown to be available, in a timely manner, before approval will be granted to new residential development including subdivisions, rezonings, and General Plan Amendments.
2. New development in the area must, along with the State of California, continue to provide the funding necessary to meet the demand for new school facilities in a timely manner.

**B-12 Alta Dutch Flat Unified School District (11/02/93)**

B-12-1. *Draft Plan* should incorporate policy originally proposed by County Office of Ed in 9/24/93 letter

*Refer to common response #7.*

B-12-2. Analysis of school impacts provided by County Office of Education should be added to Final EIR

*Refer to common response #7.*

Alta JUNTY -DUTCH FLAT UNION SCHOOL DISTRICT

x 958 • Alta, California 95701 • (916) 389-8283

November 2, 1993

Rex Bloomfield  
Placer County Board of Supervisors  
175 Fulweiler Avenue  
Auburn CA 95603

PETER T. KEESLAR  
Superintendent / Principal

LORI WARWICK  
Business Manager

PLACER COUNTY  
DATE RECEIVED

NOV 03 1993

PLANNING DEPARTMENT

Dear Rex:

The Alta-Dutch Flat School District would like to thank the Placer County Planning Commission for allowing school districts throughout the county to have the opportunity to provide input into the Draft General Plan Policy Document and the Draft Environmental Impact Report.

The Alta-Dutch Flat School District agrees with these proposed policies and, in addition, would like to request the inclusion of one additional policy that was suggested earlier.

"Proposed County general plan amendments(s), rezoning(s), rezoning(s), and other legislative acts to allow residential developments shall not be approved if it is documented by the affected school district to the satisfaction of the Planning Commission/Board of Supervisors that adequate school facilities cannot be made available concurrently with the need for such facilities."

B-12-1

It was further noted that no school impacts were analyzed in the Environmental Impact Report. The Alta-Dutch Flat School District would like to request that the analysis, including mitigation measures prepared by Jim Bush, District Facility Planner, be placed in the Draft Environmental Impact Report. Without these proposed mitigation measures, the Alta-Dutch Flat School District will be significantly impacted as a result of the approval of the Draft General Plan.

B-12-2

Your consideration of these requests will be greatly appreciated.

Sincerely,

Peter T. Keeslar  
Superintendent/Principal

cc: Phil Ozenick, Chairman Board of Supervisors  
Fred Yeager, Director Placer County Planning Department  
Jim Bush, District Facility Planner

**B-13 Auburn Union School District (11/10/93)**

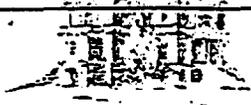
B-13-1. *Draft Plan* should incorporate policy originally proposed by County Office of Ed in 9/24/93 letter

*Refer to common response #7.*

B-13-2. Analysis of school impacts should be added to Final EIR

*Refer to common response #7.*

# AUBURN UNION SCHOOL DISTRICT



Dr. Edward F. Gilligan  
District Superintendent

471 MAIDU DRIVE

PHONE (916) 885-7242  
AUBURN, CALIFORNIA 95603

PLACER COUNTY  
RECEIVED  
NOV 10 1993

November 10, 1993

PLANNING DEPARTMENT

Mr. Phil Ozenick, Chairman  
Supervisor, District 1  
Placer County Board of Supervisors  
175 Fulweiler  
Auburn, California 95603

Dear Phil:

The reason I am writing you is my concern regarding the County General Plan Update. Since I became Superintendent in 1989, the District has been working hard to provide the proper facilities for the students of the District. We are proud of what we have accomplished up to now. However, with the forecast that the District will nearly double in the next 10 plus years, we must continue to plan and provide for the students of the District.

The final product of the General Plan Update certainly will have a tremendous influence on the school districts of the County. I have been pleased with the close cooperation between the County and the District up to the present time. I have always had the cooperation of the planning staff. I especially want to recognize Fred Yeager and Loren Clark for allowing significant school district input on the draft policy.

One policy that was not included in the Draft but, I believe, should be included states:

"Proposed County general plan amendment(s), rezoning(s), rezoning(s) and other legislative acts to allow residential developments shall not be approved if it is documented by the affected school district to the satisfaction of the Planning Commission/Board of Supervisors that adequate school facilities cannot be made available concurrently with the need for such facilities."

Without the policy, Auburn Union's ability to provide facilities to adequately serve students from new developments will be impacted.

I would also like to call your attention to the fact there was no discussion of school impact or mitigation measures in the Draft Environmental Impact report. As I understand it, impacts are required to be discussed under the California Environmental Quality Act.

If you need any additional information, please call on me.

Sincerely,

*Edward F. Gilligan*  
Dr. Edward F. Gilligan,  
District Superintendent

EG:rg  
cc: Fred Yeager, Director  
Placer County Planning Dept.

B-13-1

B-13-2