

ITEM V-B: SPHERE OF INFLUENCE AMENDMENT (SOI) AND SIERRA VISTA SPECIFIC PLAN (SVSP) – FILE # 2007PL-044 (ANN-000002, GPA-000034, SPA-000024, RZ-000037 & DA-000029)

REQUEST:

This item is a continuation of the public hearing on the Sierra Vista Specific Plan begun at the Planning Commission meeting of December 10, 2009 and followed-up on January 14, 2010. Staff has included in this report a discussion of the SVSP Design Guidelines.

APPLICANTS: Mourier Investment, LLC; AKT Investments, Inc.; DF Properties, Inc.; Westpark Associates; and CGB Investments

BACKGROUND:

At the meeting of December 10, 2009, the Planning Commission began its review of the Sierra Vista Specific Plan (SVSP) and associated Draft Environmental Impact Report (EIR). During the meeting, the Commission received public testimony and provided comments on the Draft EIR. The public hearing on the Draft EIR was closed. No formal action was taken and the public hearing on the SVSP project was continued to January 14, 2010. The Commission requested staff provide additional information regarding school district boundaries and roundabouts.

For the meeting of January 14, 2010, staff provided a report on school district boundaries and roundabouts. The Commission received public testimony and provided comments on both topics. No formal action was taken and the public hearing was continued to January 28, 2010 to continue review of the project.

The circulation period on the Draft EIR has closed. Staff received 13 comments on the Draft EIR from several agencies, organizations and interested individuals. These comments have been attached to this staff report for the Commission's information. No action by the Commission is required on these comments. The public hearing on the Draft EIR before the Commission was concluded on December 10th.

Staff will provide responses to any comments received and make any corresponding text changes to the EIR as part of preparation of the Final EIR, anticipated to be available to the public in May 2010.

DISCUSSION: SVSP DESIGN GUIDELINES

As with all the City's specific plans, the Sierra Vista Specific Plan includes a set of Design Guidelines included in the document as Appendix B. These Guidelines are a supplement to the City's recently updated Community Design Guidelines and provide design guidance for the physical form and visual character of the SVSP. The following summarizes the key aspects of the Sierra Vista Design Guidelines.

Landscape Guidelines

The guidelines for landscaping are intended to establish a basic landscape theme to be applied consistently as the SVSP develops. Landscaping in the SVSP will put into practice water conservation

measures to comply with the City's Water Efficient Landscape Ordinance (WELO), and will exceed WELO requirements in the following measures:

- Turf reduced to 42% of single-family front yards (WELO limit is 50% if developer-installed, or if homeowner-installed and more than 5,000 square feet)
- Turf reduced to 60% in parks (cumulative total) and 30% in paseos and landscape corridors (WELO exempts park active play area and landscape areas irrigated by recycled water)
- Smart, weather based irrigation controllers that shut off water during rain and adjust water time during wet soil conditions

A planting concept is provided for the landscape corridor and median on major roadways (Specific Plan Appendix B, Figure B-4). The planting concept includes design criteria for placement of primary and secondary street trees, shrubs and groundcover. A master street tree palette lists appropriate trees for various planter widths, from which a short list will be selected to be used throughout the plan area. A dozen groundcover varieties are listed for use between curb and sidewalk, including low water using tall fescue blend turf.

Additional landscape guidelines are stipulated for two special circumstances:

- A portion of the West Side Drive landscape corridor (north of the electric substation site, FD-61) lies within an overhead transmission line easement, restricting the height and location of trees, structures, lighting, and berms.
- Arterial street median breaks are limited to the locations indicated on SVSP Figure 6-6. Additional median breaks will be considered where they would result in a Level of Service improvement for an adjacent intersection. Median breaks should be designed to provide adequate space for landscaping and all sections of median must have a minimum of five trees spaced 30 feet on-center maximum.

Entry Features and Signs

A hierarchy of entrance features is described for City gateways, project entries, and neighborhood entries. Entrance features and signage are intended to be thematic and applied consistently throughout the SVSP to help define its visual character and define areas within the plan.

- **City Gateways** are located on the north side of Baseline Road at Fiddymont Road, West Side Drive and Watt Avenue (Specific Plan Appendix B, Figure B-2). At these corners the landscape corridors meet in a 100-foot corner clip. The enlarged public space will use architectural hardscape like monuments and raised planters to make them pronounced entrances to the City. Signs may be used in a subtle manner, secondary to the hardscape features.
- **Project Entries** are located at other major intersections in the SVSP, where the 100-foot corner clips accommodate large-scale hardscape elements like walls, pilasters and obelisks to make a prominent entrance statement for residential areas. Iconic emblems, logos and materials will be used at project entries then repeated on neighborhood entries.
- **Neighborhood Entries** create formal entrances into individual subdivisions at primary access points from arterial and collector streets. Neighborhood Entries may be unique to each subdivision, but will use themes and material palettes consistent with Project Entries. Neighborhood Entries may be at landscaped corner clips and must be designed to meet site distance requirements for automobiles.
- **Signage** is permitted on entrance features and must use high-quality, durable materials to resist weathering and vandalism. Signs are encouraged to be monolithic panels or plaques. Signs must be securely embedded into the surface of the wall or pilaster on which they are affixed to prevent removal and destruction.

Walls and Fences

Walls and fence types are specified for several situations throughout the SVSP as illustrated in Specific Plan Appendix B, Figure B-3. The Guidelines also include photo examples of characteristic details for each type.

- **Masonry walls** will be used at the back of arterial roadway landscape corridors, to provide security and noise attenuation. Wall openings will be provided where appropriate for pedestrian access to residential neighborhoods and paseos. Wall materials will have texture facing the public view, and a trim cap for color and visual interest. Pilasters are required, and these may include logos or emblems, but not signs.
- **Wood fences** are of two types. Standard wood fences will be used along residential streets and adjacent to parks, paseos and schools where a masonry wall is not required. Standard wood fences will be 6-feet high typically, constructed of redwood with a decorative top rail, and painted or stained in an earth-tone color. Good neighbor fences will be used in locations not visible to the public, like between residential lots. Good neighbor fences will be 6-feet high typically, constructed with wood planks on panels that alternate sides in 6 to 8 foot wide modules, and without a decorative top rail.
- **Open fencing** will be used to provide a visually transparent barrier adjacent to open space parcels. Fences may be wrought iron, tubular metal, concrete rail or post-and-cable, depending on the adjacent land use.

Street Lighting

Themed street lighting, like the City-approved decorative acorn fixture (Specific Plan Appendix B, Figure B-4), may be used on collector and residential streets. Decorative lighting is encouraged on private streets within medium density and high density developments, and may also be used in paseos where appropriate.

Paseos

A network of pedestrian and bike paths is proposed for the SVSP (Specific Plan Appendix B, Figure B-5). Paseos provide major segments of that network. Modifications to the City's standard collector street design are proposed, to reduce the pavement and travel lane widths and increase both sides of the adjacent landscape corridor to provide paseos (Specific Plan Appendix B, Figure B-6). These modifications are intended to reduce travel speeds and create a more walkable street corridor for pedestrians. Specific design criteria are provided to ensure that paseos are connected to neighborhoods, parks, schools and commercial sites (Specific Plan Appendix B, Figures B-6 through B-21).

Village Node District

Located at the intersection of Market Street and Road B will be a higher density residential district anchored to a commercial mixed use core intended to create a central gathering place for the neighborhood (Specific Plan Appendix B, Figure B-22). Guidelines are provided for the residential neighborhood, to be used in conjunction with the City's Community Design Guidelines for Compact Development. Village Node neighborhoods are encouraged to have a network of interconnected grid streets to provide multiple connections within and between subdivisions. The residential streetscape should incorporate separated sidewalks and trees, with houses oriented to the street.

The Village Node concept is centered on two 5-acre Commercial Mixed Use (CMU) parcels, which will provide for approximately 120,000 square feet of commercial/office use plus 80 high-density residential

units. The Guidelines include an illustrative concept plan to show how the two uses could be mixed on the site (Specific Plan Appendix B, Figure B-23). Key concepts include:

- Buildings oriented close to the street to define the street edge with architecture and create a pedestrian friendly streetscape;
- Street patterns in the surrounding neighborhoods integrated with streets in the CMU core to enhance connectivity for vehicles and pedestrians; and
- Houses in adjacent neighborhoods that face the CMU core.

Residential Subdivision Design

The Guidelines address how common edges between neighborhoods should be integrated, how gated subdivisions can be incorporated, and how to treat edges along roadways, open space preserves and paseos. One of the SVSP goals is to create highly-connected residential neighborhoods that are not separated by subdivision walls. Providing street connections between adjoining subdivisions is encouraged. Gated subdivisions may be allowed on certain large lot parcels; however, they may not preclude access to parks (Specific Plan Appendix B, Figure B-25). Where subdivisions adjoin a park, paseo or open space, the edge should provide visual and pedestrian access, and the internal street layout should be designed for walkability to the edge. Residential units should be facing the edge rather than backing up to it.

In addition to the Design Guidelines, the SVSP Residential Development Standards are included as Appendix A. For RS/DS (Small Lot Residential) zone districts, the SVSP establishes standards for lots with attached and detached sidewalks. The design requirements associated with the RS/DS zone have been updated to align them more closely with the Community Design Guidelines for Compact Development, because those only apply to development of 7 dwelling units per acre and higher, whereas the RS/DS zone applies to lower density projects as well. Several examples of housing types eligible for the RS/DS zone are illustrated (Specific Plan Appendix A, pages A-4 to A-8). Also new with the SVSP are the Design Criteria for Carriage Units, which provide for small residential studios built above garages on alley-loaded Medium Density Residential lots (Specific Plan Appendix A, pages A-9 to A-11).

Site Concept Plans

The Guidelines address several key non-residential sites and include concept plans for each. The plans are not final designs, but represent one way to address unique design considerations for each of these commercial and public facility sites.

- **Signature Park/Commercial Mixed Use:** A 40-acre park is planned for the southwest corner of the SVSP, intended to facilitate large scale recreation events and tournaments. Amenities could include ball fields, a stadium, a field house, food venues, and large plazas for fairs/activities that complement tournament events. The park design will be integrated with the adjacent commercial mixed use parcel to create a campus-like environment where users can move easily between the park and nearby restaurants, shopping, residential units, and shared joint-use parking facilities. An open space corridor north of the park allows pedestrian/bike access from across the creek and will link with the pedestrian/bikeway network in the SVSP and beyond.
- **Commercial Centers on Baseline Road:** Two community commercial sites sized to accommodate large floorplate retail (for example, Creekside Center) are planned for Baseline Road. The concept plans for these are schematic and serve to identify key design points like visibility from the road, areas for major and subordinate buildings, and internal parking/circulation layout. The concept plans also identify key site constraints like the interface with adjacent open space and residential uses, and the need for screening of service

areas/loading docks. These concept plans are intended to augment the City's Community Design Guidelines for Commercial Centers.

- **Commercial/Business Professional Site:** The northeast corner of the SVSP, at the Fiddyment-Pleasant Grove intersection, is planned to accommodate retail and office uses. The concept plan shows key design points like a highly-visible, distinctive building at the corner, and other buildings close to the street spaced to provide views to the interior. A significant constraint on this site is a 375-foot wide powerline easement, which may be used only for parking and other compatible ancillary uses.
- **Public Facility Sites.** The SVSP contains sites for a fire station, an electric substation, a recycling drop-off facility, and a potable water storage tank and pump station. The concept plans for these identify key points and issues for these unique uses. The concept plans represent one way the sites could develop, and are intended to be used as a guide.

RECOMMENDATIONS:

No action on the Sierra Vista project is requested at the January 28, 2010 meeting. This meeting is intended to provide the Planning Commission with additional information for consideration in future recommendations to the City Council. It is requested that the Commission provide comments on the SVSP Design Guidelines.

Prior to the Planning Commission recommendation on the project, additional project information will be presented on the Development Agreements, and fiscal considerations. A date for a future meeting to cover the remaining items will be set when those items have been finalized.

ATTACHMENTS:

- Attachment 1 Comments/questions received at December 10, 2009 Planning Commission meeting
- Attachment 2 Comments/questions received at December 17, 2009 Design Committee meeting
- Attachment 3 Comments/questions received at January 14, 2010 Planning Commission meeting
- Attachment 4 Comments received on the Draft Environmental Impact Report

Planning & Redevelopment Department
311 Vernon Street
Roseville, CA 95678

**SPHERE OF INFLUENCE AMENDMENT AND SIERRA VISTA SPECIFIC PLAN
PLANNING COMMISSION MEETING NOTES
Thursday, December 10, 2009**

SUBJECT: Draft EIR for SOI Amendment and SVSP Utilities Plan

ATTENDEES:

Commissioners: Sam Cannon, Audrey Huisking, Don Brewer,
Robert Dugan, Kim Hoskinson, David Larson
Staff: Paul Richardson, Nela Luken, Kathy Pease,
Chris Kraft, Kelye McKinney, Michelle Bertolino

NOTES BY: Steve Lindbeck

At the meeting of December 10, 2009, the Planning Commission reviewed the Sphere of Influence Amendment, Sierra Vista Specific Plan, and Draft Environmental Impact Report (EIR). The meeting was primarily focused on the Draft EIR, and several comments and questions were raised by the Commission. These comments will be included in the Final EIR which will be forwarded to the City Council for review and consideration.

Commissioner Larson

What is the difference between 65 dB and 75 dB?

An increase of 3 dB is usually perceived by most people as a doubling of the sound's loudness.

Is the airplane flight path to McClellan Field north-south over the plan area?

McClellan Field is due south of the plan area. There is no manned control tower so pilots must navigate visually. There is no standard flight path and planes can come in from any direction. Aircraft will typically approach the field in a north-south direction depending on the weather.

Commissioner Hoskinson

The school district boundary runs through some residential areas. My concern is that children living across the street from each other could be going to different schools. That's not good planning. How can this be addressed?

This is not an EIR issue, but more of a social issue. We can discuss it more in one of the January meetings if the Commission is interested. The City doesn't establish the district boundaries and we considered them as the land use plan was developed. The school district boundaries indicate where school fees will be paid. In reality, residents can request inter-district transfers if they find themselves in that situation. The City can't move the district boundaries; that is done by another agency. We can require

disclosures to home buyers in those neighborhoods so they understand homes across the street are in a different district.

Where is the off-site grassland?

The off-site grassland hasn't been identified yet. When the individual applicants at the time of tentative maps or grading permits will need to show how they are meeting their portion of the obligation for habitat mitigation.

Commissioner Dugan

How do we petition LAFCO to re-evaluate the school district boundaries?

It's not a LAFCO issue. School district boundaries are established by another agency.

Commissioner Larson

Is the amount of Class I trails in Sierra Vista equal to the West Plan? What is the timing for their construction so they are connected throughout the entire Sierra Vista?

We have taken advantage of the open space available for trails. The West Plan has 10 miles of bike trails and paseos, the Sierra Vista has about 9 miles, so they're very comparable. We will collect a bike trail fee and as money is available the trails will be built.

Who determined the total number of spaces in the park and ride lots?

City staff did.

Will the signal lights on Road B be synchronized? My concern is that traffic southbound on Fiddymont will turn on Road B heading west to avoid the bottleneck at Fiddymont and Baseline.

Road B is an arterial roadway. It will be designed to handle larger volumes of traffic. It will be a benefit to Baseline, because it will relieve some of the congestion on Baseline.

Can there be two right turn lanes, instead of just one, from southbound Fiddymont to Baseline?

We considered that and did a comparison with several other intersections in the City. We feel if we extend the right turn lane to approximately 300 feet and do an overlap with the left turn movements that will be coming off Baseline, that it will function fine.

Commissioner Huisking

I think roundabouts are a good idea if they are designed well. There are two that I can think of. The one by La Provence works and maybe it's a little larger. Those behind the Fountains may be too close together, but traffic doesn't feel like it flows like it should.

Commissioner Cannon

I see the traffic calming effect roundabouts bring. But for kids walking and riding bikes to school they are difficult to navigate and there are safety challenges. I think we should make sure the pedestrian issues are properly addressed before we do roundabouts.

Roundabouts are certainly safer for vehicles and three out of four traffic experts say they are safer for pedestrians. They also reduce vehicle emissions at the intersection by 30 percent. A typical four way intersection has 30 potential points of vehicle-to-vehicle impacts and 24 potential points of vehicle-to-pedestrian impacts. In comparison, a roundabout has 8 potential vehicle and 8 potential pedestrian conflicts. Also, when a pedestrian crosses the roundabout street they need to look only in one direction, cross to the center island then look the other way and cross to the other side.

Commissioner Dugan

Have you tried walking across a roundabout? You can't. I appreciate what the experts say and I see in my travels they are the hot thing. I don't think they should be used just because they're popular, only if they're needed.

Commissioner Cannon

It's outstanding to hear that Roseville is working regionally on traffic issues with Sutter, Placer, and Sacramento counties. Problems on Baseline Road are not just a problem for one, but for all.

Commissioner Hoskinson

Roundabouts are unnecessary unless they are used to correct a problem, like they did at the mall. They shouldn't be put in a pedestrian-friendly neighborhood. I don't want them here.

How far south on Watt Avenue will the bus rapid transit lanes go?

Ultimately, the BRT will pick up passengers at the light rail station on I-80. The Placer Vineyards project has reserved the right-of-way similar to what we propose for Watt.

One of the paseo exhibits showed a 10-foot wide bike path on one side of the residential street and 5-foot sidewalk on the other side. I thought sidewalks were 4 feet. I'd rather have a 4-foot sidewalk and 1 extra foot of property.

When sidewalks are separated from the curb by a landscape planter, sidewalks are 5 feet wide. When attached to the curb, sidewalks are 4 feet wide and the curb adds to the width. These have been our standards for a long time.

When it comes to impacts on Walerga and Riego roads, are there already fees in place for those impacts? And you want additional fees? Who pays those fees? When will it help? How much is the traffic fee?

Those fees are paid at building permit issuance, as part of our fee program. Currently we have 5 fees for traffic, which are calculated based on the location of the building/house. If your location is closer to a road section it is assumed you will use that road more and your fee is greater. Depending on the location, the traffic fees can be \$8-10,000 overall. If new fees are adopted they would be in addition to the current fees.

Commissioner Brewer

What is the landowners' objection to the roundabouts? On the map are two roundabouts close together. How far apart are the two? And there's a third farther away. Do you need the third? Does a traffic signal cost more than a roundabout?

Mostly they cite the increased cost. The first two roundabouts are on collector streets, where the traffic levels don't warrant a signal. We have a Class I bike trail crossing at those locations, so the roundabouts help with that. The third is a tee-intersection at Road A and Market Street, where the daily traffic will be high but still not enough to warrant a traffic signal. A three-way stop there would increase congestion.

Commissioner Hoskinson

How many people do 11,000 acre feet of water service?

That is 2,200 homes, so at 2.5 people per home, that's 5,000 people.

What is a sewer lift station?

It is a pumping station, used where gravity flow doesn't work because of site elevations. Waste water is pumped into a force main up to a main where gravity flow can take over.

We all use cell phones, which need towers. Are cell phones addressed in the Draft EIR?

No, we didn't address it at this point and there aren't any plans for towers yet. Telecommunications providers come in to an area after the people and demand are there. Tower applications would be analyzed at that time. Our existing policy encourages the providers to co-locate on towers to reduce the number of tower locations. The WAPA corridor runs right through the SVSP with existing towers that may be ideal co-location sites. When we co-locate on existing facilities the impacts are less than significant.

Commissioner Cannon

Please expand a bit on the potential for competition on the electric service.

The June 2010 ballot may include an initiative proposition that if approved would affect this. As proposed in the initiative, if a public power provider wants to expand its service territory and use rate-payer funds or bonds to expand that service, the provider will need to take it to a vote of both their existing customer population and those in the expansion territory, and will need a two-thirds majority vote to approve the expansion.

Commissioner Huisking

Will the state's Delta water plan reduce the amount of surface water in Folsom Lake? If that means there would be more driest year conditions when we would need to use groundwater, will two wells be sufficient?

It will not change the amount of surface water, but it could change the frequency of drier and driest year conditions where we would be cut back to 39,000 acre-feet. This issue is analyzed in the EIR. Our current pumping capacity is already adequate to meet our needs, and this project would add two more wells.

Commissioner Dugan

I want to thank staff for coming prepared to give us the big picture on water, traffic and transportation, because it's good to put things in context when we look at these specific plans and the policy issues coming up. It sounds like the City is engaged, looking forward and making sure we're prepared.

Commissioner Larson

What is the City's current acre-feet/year water demand?

The current demand is about 34-35,000 acre-feet/year.

Considering the aquifer, have there been any studies indicating the possibility of land subsidence issues?

With the studies that have been done about the groundwater basin we do not see any land subsidence issues with the current groundwater pumping. With the conversions of agriculture land to other uses happening regionally groundwater pumping will actually be reduced, so we do not anticipate any land subsidence issues in the future.

Does the utility services ballot initiative apply to City boundaries?

It is for existing territories of municipal utilities, so that is mostly cities.

Commissioner Brewer

Compliments to staff for doing an excellent job. You were very transparent and with full disclosure, there was nothing there that would affect the climate of the earth. So I think you've done an excellent job.

Public Comments

None

Planning & Redevelopment Department
311 Vernon Street
Roseville, CA 95678

**SPHERE OF INFLUENCE AMENDMENT AND SIERRA VISTA SPECIFIC PLAN
DESIGN COMMITTEE MEETING NOTES
Thursday, December 17, 2009**

SUBJECT: Sierra Vista Specific Plan Design Guidelines

ATTENDEES:

Committee Members: Audrey Huisking, Naaz Alikhan, Anna Robertson
Staff: Paul Richardson, Nela Luken, Kathy Pease, Steve Lindbeck

NOTES BY: Steve Lindbeck

At the meeting of December 17, 2009, the Design Committee reviewed the Design Guidelines of the Sierra Vista Specific Plan. The following represents the comments made by the Committee, which will be forwarded to the Planning Commission and City Council for review and consideration.

Committee Member Alikhan

This is an in-depth planning document. The Community Design and Visioning Committee's work has been taken into consideration. What were the Planning Commission's comments?

The Planning Commission has reviewed the Specific Plan and Draft EIR. The Commission asked for more information in a couple of areas. They still have to go through the Design Guidelines and the Development Agreements, so there will be at least two more hearings.

Committee Member Huisking

I think this is a well thought out plan. Will the masonry walls be block or tilt-up?

They will be masonry block walls.

Public Comments

None

Planning & Redevelopment Department
311 Vernon Street
Roseville, CA 95678

**SPHERE OF INFLUENCE AMENDMENT AND SIERRA VISTA SPECIFIC PLAN
PLANNING COMMISSION MEETING NOTES
Thursday, January 14, 2010**

SUBJECT: SVSP School District Boundary and Roundabout Discussion

ATTENDEES:

Commissioners: Sam Cannon, Audrey Huisking, Don Brewer, Gordon Hinkle,
Robert Dugan, Kim Hoskinson, David Larson

Staff: Paul Richardson, Nela Luken, Chris Kraft

NOTES BY: Steve Lindbeck

At the meeting of January 14, 2010, the Planning Commission continued its review of the Sierra Vista Specific Plan. The meeting was primarily focused on two issues raised by the Commission during the December 10, 2009 public hearing. Additional comments and questions were raised by the Commission, which will be forwarded to the City Council for review and consideration.

SCHOOL DISTRICT BOUNDARY DISCUSSION

Commissioner Huisking

Have the school districts seen this boundary issue as a problem?

The school districts were involved with developing this land use plan and did not identify it as problem. All three districts are open to the idea of adjusting the boundary and have met to discuss the matter.

Marcus Lo Duca, representing the landowners

It is clear from comments by Commissioners, City staff, and the school districts we all agree that a district boundary should not to divide a neighborhood. However, it really is an issue for the three school district boards to resolve. The districts are already working together and working with staff on options.

Scott Loehr, Superintendent of Center School District

We have met with staff to address this and also met with the other two districts. We already have a tentative agreement that the FD-4 area will be transferred to the Center District. The CO-21 area is still a sticking point, but we are all willing to work though it. At this point we cannot say we have it worked out, but we are confident that we will come up with a solution.

Commissioner Hoskinson

The school district boundary is a major issue for me. The districts have to make it right. If Center School District gets FD-4 it gains 15 students; if it gives up CO-1 and CO-21 it loses 37 students.

That's a net loss of 18 students, when you are gaining 3,500 students from the SVSP project as a whole. There isn't a project now or any students now.

There are many factors beyond the 18 students, like what would happen to the north when the next development comes forward. Center School District is committed to finding a solution, but we do not have one yet. The loss of 18 students is not a trivial matter when you realize it is not just the money the first year, but \$6,000 per student a year after that.

Commissioner Huisking

It bothers me that children become dollars and cents, instead of human beings. These are people that schools are supposed to be forming, not throwing up a wall before they get started, so there are problems for them.

Commissioner Larson

Can the 18 students in question petition to go to the other district?

Yes, there is an inter-district transfer process.

Commissioner Hoskinson

Interdistrict transfers can happen, but the school district can shut the door on it at any time.

Commissioner Dugan

I encourage the school boards to do the right thing by adjusting the boundaries to make the neighborhood work, which may not be the most fiscally profitable.

ROUNDBOUT DISCUSSION

Commission Hoskinson

Staff states that increased traffic might happen here if other streets are not built. I have never heard that raised as an issue before.

Generally, when we do specific plans we are looking at build-out of a large phase. In this case we are allowing the potential for sub-phasing and not requiring the construction of all infrastructure in one phase (before the next phase starts). This is a different approach than what's been done in the past. In this case the City will require needed infrastructure only, and we don't know when the next sub-phases will develop or where until it is proposed. So there is greater potential for excessive demands on certain roads before the full infrastructure is built.

I'm not so concerned with the cost to the developer. I can't see bikes and pedestrians able to cross roundabouts safely, when you say there is no stopping of vehicles. Citing the MacAnally-Country Club intersection is not a good comparison because of the traffic going to two schools there every morning. The diagrams comparing conflicts between cars and pedestrians are not believable, because there is really only one point in a lane where a vehicle can hit a pedestrian not three points. These are proposed in neighborhoods where pedestrians and bikes are crossing and I'm not convinced they are safer.

Commissioner Hinkle

Please clarify the cost of adding a signal in the future.

A traffic signal is between \$250-350,000. A roundabout is maybe \$100,000 more than a 4-way stop intersection. The need for one temporary signal at Market and Road A would pay for all three roundabouts.

Commissioner Larson

What is the estimated speed on Market and Road A?

Probably 35 mph. Usually they would be 40, but the project has reduced street widths to calm traffic.

Marcus Lo Duca

The Sierra Vista Specific Plan is proposing an extensive number of design features for pedestrians and cyclists: 9 miles of paseos and 21 miles of off-street bike trails. Our objections to roundabouts are two-fold. The additional cost is one that we cannot afford, given all that we are doing. We respectfully disagree with the 18 percent figure and believe that in the final design and construction the cost will be a multiple of that. From a pedestrian and cyclist safety standpoint, we respectfully disagree that the roundabout is safer from what we propose. Its not that we don't have a proposal, we do and it's a 4-way stop intersection. We don't disagree that a roundabout handles a higher traffic volume than a 4-way stop, but the intent here is not the volume, it's to slow vehicles for pedestrians and cyclists to safely cross the street. If safety is the intent then a 4-way stop is the way to go. The crosswalks by La Provence are not collector streets intersections, but residential streets.

Regarding the interim traffic analysis, to my knowledge we've never done that before. The EIR looks at build-out conditions and does not show a signal at any of these intersections. We don't design for an interim condition.

Commissioner Hinkle

I've seen people zip around the roundabout not thinking they have to stop for anything. My 7-year old was almost hit on a bike, so I've seen the disregard for pedestrians and cyclists. I'm not convinced by the statistics or the points on the graphic. The examples where they work, it's for high traffic volumes. I don't think they're right for here.

Commissioner Huisking

I love roundabouts; I think they're cool. But in the US and California folks don't know how to use them. The ones by the Fountains are scary and taking a bike through there is really scary. I think they have a use, and may work at intersection A if it's built large enough. The ones that work best, like those in Europe, are just for vehicles.

Commissioner Cannon

I see the roundabouts by La Provence every day, and I see pedestrians are confused by them. We need to educate people how to use them. Children travelling to and from school cross the middle where they shouldn't; maybe we should more clearly demarcate the crosswalks. At the Fountains, I've seen cars zipping through with pedestrians all around and I'm concerned. I

appreciate the reduced emissions and traffic calming, but pragmatically we need to look at the cost of the project.

Regarding education, a Roseville Reflections bulletin sent out with utility bills had an article about how to use roundabouts. It is probably time to do that again.

Regarding the roundabouts at the Fountains, we don't have plans to modify them because we're not experiencing conflicts.

Commissioner Dugan

I love the roundabout at Truckee and I would have loved one at Vernon and Riverside; they're great for moving vehicles. I think they'd look good as an entryway into a neighborhood. I'm not convinced we should be putting them in the specific plan.

Commissioner Hoskinson

In the staff report recommendation, I would like an option that the roundabouts aren't part of the project. I don't think this is the right place for them.

Roundabouts are currently not part of the project so language is not needed to eliminate them from the specific plan. They have been a discussion point since the beginning.

Commissioner Larson

I concur. Safety is paramount and balance that with cost.

Commissioner Hoskinson

How do you bring in bike paths?

Cyclists would use the pedestrian crosswalk or may elect to travel with the cars.



COUNTY OF PLACER
Community Development Resource Agency

ATTACHMENT 4

ADMINISTRATION

Michael J. Johnson, AICP
Agency Director

January 7, 2010

Paul Richardson
Director of Planning and Redevelopment
City of Roseville Planning Department
311 Vernon Street
Roseville, CA 95678

**SUBJECT: Placer County Comments – Sierra Vista Specific Plan
Draft Environmental Impact Report**

Dear Mr. Richardson:

Thank you for providing Placer County the opportunity to review the Draft Environmental Impact Report for the Sierra Vista Specific Plan. We have reviewed the document and compiled the following comments for your consideration.

- Circulation Plan
 - a. Figure 6-2 & 6-3- Watt Avenue and Baseline Road — Both the Placer Vineyard and Regional University Specific Plans have a 20-foot median/turn-lane planned for the portions of Watt Avenue and Baseline Road that are located within Placer County. In order to provide consistency with County Street and Roadway section we recommend that the City include a 20-foot landscape median for Watt Avenue and Baseline Road. In addition, we recommend that Watt Avenue include at a minimum 50 feet of landscaping with a meandering Class 1 trail.
 - b. Figure 6-2- Clarify the location of the future BRT lane. Will the BRT lanes be provided in the median or adjacent to the landscape corridor? What are the dimensions of the BRT lanes?
- The Extension of Watt Ave through the Richland Urban Reserve is described as an Offsite Improvement and the ROW is not shown to be reserved through the parcel, yet this roadway is necessary for the development of the approved Regional University project. How does the City intend to ensure that this ROW will be available when necessary for development of this project and does not cause a potentially significant impact?
- The extension of Road "B" to the projects westerly boundary is shown in the DEIR and has been previously shown to be necessary for traffic circulation within the project and region, but the document doesn't include any provisions or obligations for either the project developer or the City to actually extend it to the boundary.
- The document is unclear as to what improvements, and when, the project applicants will be constructing along Baseline Road. The Project Description shows full

improvements at intersections but states that "phased improvements" will be constructed yet the Mitigation Measures state that the developer may mitigate impacts by contributing their fair share of construction costs. The document doesn't appear to contain language obligating the developer to construct transportation improvements necessary to mitigate their impacts.

The Specific Plan and DEIR include a phasing plan for build out of the project, but neither the mitigation measures or traffic analysis include a description of what mitigations are necessary or when they should occur for each phase. The Existing plus Project and 2025 analysis show two potential scenarios', but if only portions of Phases develop and the full project doesn't build out, where is the project obligated to mitigate the impacts they do create?

The Transportation Section contains a statement that the Sierra Vista Specific Plan will be required to widen Baseline Road to four-lanes from Fiddyment Road to the western Specific Plan Boundary, but the obligation to construct these improvements is not within the Project Description, nor is it a Mitigation Measure.

- The document doesn't provide a description of the impacts and implications of the potential annexation of Baseline Road into the City, or acknowledge how County rights, including access rights would be maintained or preserved and how future expansions would be addressed.
- The DEIR identifies impacts to select intersections within Placer County, but should include a provision that the Sierra Vista development be obligated to pay their fair share for impacts to all roadways and intersections contained within the County Benefit District CIPs.

Fiscal and Services

- The ADEIR identifies a range of municipal services proposed to be provided by the City of Roseville; however the analysis does not include the impact of this increase in population to countywide services provided by Placer County. The County will still be responsible to provide County services to all new residents within the new City development area on a level similar as being provided to existing County residents.

The last fiscal study reviewed by the County, dated February 7, 2007, while showing some revenue shortfall, affirms the feasibility of the City to remain fiscally neutral or positive in providing municipal services with development of the project with a typical and reasonable level of special assessment.

New development in cities and associated environmental documents and fiscal analyses need to recognize the service delivery and funding implications for providing countywide services as well as municipal services. Please incorporate this discussion as it is currently not considered in the ADEIR.

- Under the Fire section; while the section addresses impacts to service delivery fairly well, it is noted that the Fire Service Construction Tax (FSCT) expires December of 2009. So as not to adversely impact Placer County Fire facilities/services nor the

Paul Richardson

January 7, 2010

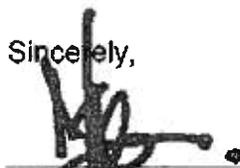
Page 3

overall tax base which supports countywide services, it would be important that the City address the capital outlay funding structure for fire services since this project will be approved after the sunset of the FSCT.

- Under the Library section; The document mentions the Placer County public facilities fee. This text seems misplaced in that Roseville provides its own libraries and does not pay Placer County. Further, the text states that Roseville provides library services to surrounding counties, including Placer. This section should be deleted, Placer County provides library services for the unincorporated area.

Once again, thank you for providing the County the opportunity to provide comments on the DEIR for the Sierra Vista Specific Plan. The County appreciates the ongoing collaborative interactions with the City. Should you have any questions regarding the information in this letter, please do not hesitate to call me at (530) 745-3099.

Sincerely,



MICHAEL J. JOHNSON, AICP
Agency Director

cc. Rich Colwell, Chief Assistant CEO
Scott Finley, County Counsel's Office
Gina Langford, Environmental Coordinator
Wes Zicker, Engineering and Surveying Director
Paul Thompson, Deputy Planning Director
Ken Grehm, Department of Public Works Director
Andy Fisher, Facilities/Parks
Angel Rinker, Air Pollution Control District
Leslie Lindbo, Environmental Health Services
Phillip Frantz, Engineering and Surveying Department
Jennifer Dzakowic, Planning Department
Allison Carlos, County Executive Office
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Center Joint Unified School District



Established 1858

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SUPERINTENDENT

Scott A. Loehr

January 6, 2010

By U.S. Mail & E-Mail: kpease@roseville.ca.us

Kathy Pease, AICP
Senior Planner
City of Roseville Planning Department
311 Vernon Street
Roseville, CA 95678

Re: Comments of Center Joint Unified School District to Draft Environment Impact Report ("DEIR") for the Sierra Vista Specific Plan

Dear Ms. Pease:

Center Joint Unified School District ("CJUSD") submits these comments on the Draft Environmental Impact Report ("DEIR") for the 1,624 acre Sierra Vista Specific Plan ("SVSP") and annexation of the entire 2,064 acre SVSP and Urban Reserve Area into the City of Roseville ("City") (the SVSP and annexation are collectively referred to as the "Project"). Thank you for this opportunity for comment. For the convenience of the City as it reviews this letter, the following comments are divided by topic.

1. Overview

CJUSD appreciates the cooperative and supportive position that the City of Roseville has taken with supporting the district and its objectives to have quality schools that deliver the best instruction to its students. The comments contained in this letter are designed to enhance the environmental review process and to express the concerns of the district. Although the City of Roseville has given the district guidance and support, the CEQA process and subsequent approvals can permit a wide range of activities and decisions by the projects proponents, county, state and Federal reviewing agencies, and future residents of the SVSP area. It is the intention of the district with this letter to outline its concerns and to narrow the scope of future actions as it relates to schools within the CJUSD, which will serve SVSP students.

CJUSD's primary objectives in commenting on the DEIR are to assist the City in understanding and analyzing school issues so as to ensure an adequate CEQA analysis, and also helping to ensure that impacts on schools are in fact addressed and sufficiently mitigated. We note that CJUSD has been working with the Sierra Vista developers on an agreement to mitigate certain school impacts. CJUSD is confident that a cooperative and coordinated process involving the school districts, the developers and the City will help ensure that impacts on schools and related issues are in fact adequately resolved. CJUSD encourages and requests such coordination, as it feels strongly that local governments should act in concert to ensure the availability of adequate public facilities and services.

2. EIR as First Tier Environmental Document

With the exceptions of certain issues identified in this letter, the DEIR has generally set forth a reasonable description and analysis of the potential impacts on schools. CJUSD understands that the City intends for this EIR to be a "first tier" environmental document, upon which subsequent environmental review of future development

and construction in the Project area can be based. In that vein, CJUSD intends to tier off of and rely upon the analysis contained in the DEIR as to traffic analysis, school site location and other related issues. Such tiered analysis can help avoid the need for repetitive EIR's for different aspects of the development of the future facilities in the Project area, which is in keeping with the intent of CEQA.

The District requests that the City confirm and ensure that these aspects of the Project have in fact been considered and analyzed in the DEIR. For example, while CJUSD might have to address limited specific issues related to school construction in future CEQA documents, such as a notice of exemption or negative declaration, the siting planned for the schools within the Project area is sufficiently known that related CEQA concerns (such as traffic issues for trips to and from the schools) can and should be sufficiently addressed at this time in the DEIR. This will allow for orderly planning, and will avoid the need for a full EIR for each future school project, which EIR would unnecessarily duplicate elements of the DEIR.

3. The Project creates the foreseeable potential impact of dividing an existing community through attempts to reorganize historical school district boundaries.

The foremost concern for CJUSD is ensuring that current and future students of the District are provided a quality education in adequate facilities. Unfortunately, the nature of the Project and how it is situated creates a potentially significant, foreseeable impact by encouraging efforts to reorganize historical school district boundaries. Although the CJUSD believes that the City would assist the district in opposing any future school district reorganization, the district recognizes that the City has no authority to prevent such action. Therefore, the CJUSD must submit this concern as a comment to the SVSP EIR with a hope that in the EIR certification process, a record of the district's concern will serve as evidence that the potentially significant, and foreseeable impact of school district reorganization will be well documented.

Such reorganization would jeopardize the District's ability to meet the concern expressed above. One potential impact of a future territory transfer of school district property is division of an historical community. The division of an established community is a recognized subject for consideration under CEQA. (See CEQA Guideline, Appendix G (Environmental Checklist Form), Part IX (a).) Indeed, even with no future boundary adjustment efforts, the fact that the Project will have housing that stretches across the boundaries of existing school districts has the potential of dividing the established school district communities. Additionally, other impacts that may result from future boundary changes resulting from the Project are racial, ethnic and socio-economic segregation of the school system and a serious financial impact on CJUSD.

The DEIR has only briefly evaluated a critical characteristic of the Project – its location within the jurisdictional boundaries of three school districts: CJUSD (a K-12th grade district), Roseville City School District ("RCSD") (a K-8th grade district), and Roseville Joint Union High School District ("RJUHSD") (a 9th-12th grade district). (DEIR, p. 4.11-14.) There is little discussion of the boundary issue and its potential for impacts aside from the identification of the Project's location within the established districts. As set forth below, the fact that the Project area spills over from CJUSD into the Roseville school districts is a unique feature that carries with it foreseeably significant impacts.

Without the City's affirmative support for the Project remaining as it is currently situated, primarily within CJUSD, efforts foreseeably could mount for the Project territory to be transferred into the Roseville school districts. Moreover, the location of the Project within the jurisdiction of the three school districts can create extreme pressures to change the long established, pre-existing school district boundaries to match the limits of the development or certain neighborhoods planned within that development. This can result in various negative impacts, including: difficulty on the part of the school districts in being able to plan for their future growth; uncertainty for school districts, developers and community alike; uncoordinated planning; and future disputes that can delay developments and result in high costs to the public as school districts are forced to contest or even litigate over reorganization efforts. For these reasons and those discussed in more detail below, we request that this issue be analyzed and/or discussed in the DEIR or an addendum and the impacts appropriately addressed.

a. Overview of school district reorganization.

The type of school district reorganization that most foreseeably could impact the proposed Project is the transfer or annexation of all or part of the territory of one district to another district. (Educ. Code, § 35511.) Such territory transfers are typically initiated by petition of one of the following groups: 1) the owners of uninhabited territory

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proposed for reorganization; 2) 25 percent of the registered voters in the inhabited territory proposed for reorganization; or 3) petition signed by the majority of the members of the governing boards of all affected districts. (Educ. Code, § 35700.) A territory transfer can also be started by direct request to a County Committee on School District Organization by petition of 10 percent of registered voters or by resolution of a city or county. (Educ. Code, § 35721.) The review and approval process requires a determination of sufficiency by the County Superintendent, a public hearing, review and approval by the County Committee on School District Organization, review under CEQA, and possible appeal to the State Board of Education. If the area is inhabited, reorganization is then subject to public election. (Educ. Code, § 35700, et seq.)

b. Reorganizing long-established school district boundaries would divide an established community.

CJUSD has worked proactively for decades to ensure that students within its historic school district boundaries would be privy to the same quality education provided to its current and former students. Over the years there have been a number of attempts to reorganize CJUSD's boundaries, each of which has been contested by CJUSD. To date, with only one exception for an unusual circumstance noted below, the community has generally remained within its existing boundaries a cohesive, diverse population, even as it increased in size.

The deep and rich history of CJUSD lends some insight into its long-established community, of which the Project will become a part. The District was purposefully formed by its citizens close to 100 years ago to serve the same portions of South Placer County and portions of North Sacramento County as it does today. In the intervening century, successive generations of citizens have reaffirmed their desire to have the school district constituted as it currently is. Center School District was founded in 1862 in the northern half of Center Township and served children from Rocklin to the Sacramento River. In 1869, a petition was approved to transfer the JJ Williams Ranch, at the corner of Eleverta Road and Elwyn Avenue into the Center District. By 1881, the Union (School) District of Placer County and the Center (School) District of Sacramento County shared responsibilities for schooling their children. On February 7, 1908, the two school districts consolidated to form the Center Joint School District. The name Center was chosen because of its central location between Rocklin and Sacramento.

In 1918, there was an attempt to annex Center into the Roseville School District, but local people wanted to maintain their community and its schools as they were and CJUSD remained intact. In the first half of the 20th century, as the community grew slowly and steadily, CJUSD acquired more land and schools were constructed to meet the needs of a growing population. In 1955, Arthur Dudley School was built to accommodate the new McClellan Air Force Base housing. The student population of some 300 children soon rose to over 700, and Center Elementary School was built at its present location to accommodate the growing community. In 1965, Cyril Spinelli School was built; and that year two attempts were made to unify CJUSD with the Roseville High School District. CJUSD's citizens defeated both attempts.

The only successful contested reorganization of CJUSD's boundary occurred in 2002, after the Morgan Creek development commenced planning efforts using an inaccurate map and failed to coordinate with CJUSD during the planning process. Believing the proposed development was located in Dry Creek School District, the developer pressed on with project approvals assuming that its homes would be in the Dry Creek School District and reached mitigation agreements with Dry Creek even while CJUSD incurred debt for construction of a nearby school to house students from the project. While CJUSD ultimately agreed to the territory transfer, extensive time and resources had to be expended on the issue, and CJUSD procured a multi-million dollar settlement from the developer to offset CJUSD's losses.

The attempt by the Morgan Creek development to have boundaries changes is one that often replays itself in new developments that straddle school district boundaries. Throughout the State, there has been a trend toward local efforts to reorganize relatively wealthier and less ethnically diverse homes from a more diverse school district and transfer them to what is perceived as a wealthier school district, increasing the potential for segregation and for economic impacts on the more diverse school district. This often occurs when parts of new development are in or right up against another school district. This is particularly troubling in light of the fact that the motivation behind a territory transfer is often to increase the value of property or homes in the transfer area. The very nature of the location of the current Project in three school district's boundaries has the potential of feeding this trend, making future reorganization efforts a likely impact of the Project.

Additionally, because the Project does not propose to have any physical barriers (man made or natural) between the homes that would be built in the different school districts, neighbors in the future may start up their own

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reorganization efforts. This typically and frequently occurs when students from homes that may be right across the street from one another attend schools in different school districts. We can point to many examples in recent years of school districts that have gone through developer neighborhood efforts to reorganize when development is planned to overlap school districts, such as our own Morgan Creek development experience, Oakley and Knightsen School Districts in Contra Costa County, Campbell Union High School District and various of its surrounding school districts, as well as Los Altos and Palo Alto Unified School Districts, in Santa Clara County, Monterey Peninsula Unified School District and North Monterey County School District in Monterey County and many others (please let us know if you would like further information about these or other reorganization efforts.)

The proposed Project area is currently rural and relatively flat land and has no naturally isolating topography that would separate it from the remainder of the CJUSD community. The Project area has always shared in the Antelope community by paying taxes to support CJUSD schools and voting in CJUSD school board elections. In light of the rich history of CJUSD and the community of which the Project is already a part, the City should recognize the potential pressure to change school district boundaries that could result from approval of the Project, and should discourage any efforts to divide the existing community through future reorganization.

- c. A reorganization of CJUSD will reduce the overall assessed value of the property within the school district, jeopardizing the bonding capacity already approved by its constituents.

In 2008, the citizens of CJUSD passed Measure N to authorize the issuance of general obligation bonds. The purpose of the bond is to allow the building of new schools and classrooms to prevent student overcrowding, modernize existing schools, improve health and safety, provide new technologies, acquire school facilities and qualify for State matching funds. Based on the current assessed value of property in CJUSD, it is estimated that the life of this bond may reach 30 to 40 years and will be sufficient to meet a significant portion of CJUSD's facilities needs. In the event that the Project area is transferred to other school districts, the current and future assessed value of the property within CJUSD's boundaries will decrease significantly. This could result in a district-wide property value that does not support issuance of the full value of the bond authorization. This would be a significant financial impact on the District and its ability to build school facilities authorized by its constituents and necessary to adequately house the District's students.

- d. The City should require analysis of these foreseeable impacts and mitigation to help avoid them.

As properly noted by the DEIR: "this is the first specific plan that the City of Roseville is processing that a majority of students would be attending a school outside of the Roseville school districts." (DEIR, p. 4.11-25.) As such, it is critical that the City consider and analyze the significant potential impacts of foreseeable reorganization efforts and discourage the transfer of CJUSD territory to another school district through appropriate mitigation measures.

The involved developers have stated their intent to CJUSD not to seek any change in existing school district boundaries. The City can support CJUSD and the developers by expressly acknowledging the Developers' commitment to retain existing boundaries, and further making the following modifications to the DEIR and imposing mitigation measures to address the aforementioned foreseeable and potentially significant impacts.

1. The issues addressed in this comment letter should be analyzed and included in the Final EIR, including discussion of the intent of all of the involved school districts, the City and the developers that the Project remain predominantly a part of CJUSD, and that existing school district boundaries be retained.
2. The City should require, as a mitigation measure and as a condition of Project approval, that the developers enter into a binding agreement with the CJUSD, which memorializes the parties' agreement that the Project remain part of CJUSD, and which requires that future buyers of the developers' homes must be informed of that agreement.
3. The City should require a mitigation measure that future homeowners must fund any future CEQA analysis that may be required as a result of a petition to reorganize school district boundaries within the Project area.

Inclusion of analysis of these criteria and the fact that they do not appear to support a future school district boundary adjustment would help clarify the EIR, address an important potential impact issue, and would help avoid the need to repeatedly revisit the boundary issue in the future, as CJUSD has experienced in the past.

- 4. To the extent the DEIR is relying upon agreements between the developers and CJUSD to reduce school impacts to a less than significant level, execution of such agreements should be required as specific mitigation and a condition of Project approval.**

Page 4.11-25 of the DEIR states:

Consistent with City policy, the applicants will voluntarily enter into mutual benefit impact fee agreements with all three school districts to fully mitigate school impacts in accordance with the Specific Plan Development Agreements and the funding agreements with the respective school districts. This is considered a less than significant impact.

Based upon the foregoing language, it appears that the Preparer is relying upon the agreements to be entered by CJSUD and the developers as a means to memorialize the parties' agreement that the environmental impacts of the Project have been reduced to a level of less than significant through the fee agreement. However, these agreements have not yet been finalized or executed by the parties. To ensure that the proposed terms of the agreements are implemented (which notably include reservation of school sites and payment of a fee to offset the costs of construction), execution of a mitigation agreement should be included as an expressly required mitigation measure for the project, as well as a condition for Project approval.

- 5. The DEIR's characterization of Senate Bill 50 is not accurate.**

At pages 4.11-19-22 of the DEIR, the DEIR concludes that Senate Bill 50 ("S.B. 50") "capped" developer fees at a statutory rate, payment of which constitutes full mitigation of school impacts under CEQA. This characterization of S.B. 50 is not accurate in several respects.

First, while S.B. 50 clarifies that a project may generally not be denied under CEQA solely on the basis of inadequate school facilities, the legislation does not relieve the City from analyzing school impacts and concluding whether there are significant impacts on such facilities. Furthermore, the environmental analysis must recognize impacts that remain unmitigated based on the available data. To the extent that there are unmitigated impacts, despite the payment of statutory impact fees, the City must then adopt a statement of overriding consideration, finding that the merits of the project outweigh the unmitigated impacts.

Second, the characterization of a statutory fee "cap" is not accurate. S.B. 50 provides for three flexible levels of fees, based upon certain conditions being met. The first is the existing statutory fee, which we refer to as a "Level 1" fee. (Gov. Code, § 65995.) That fee is adjusted for inflation every two years by the State Allocation Board ("SAB"). The second, or "Level 2" fee – referred to in the legislation as an "alternative" fee – is the equivalent of the statutory fee plus an additional amount that, when taken together, are assumed under state standards to equal roughly 50% of a district's actual facilities needs. (Gov. Code, § 65995.5.) The final "Level 3" fee, which is roughly 100% of a district's need as established under the state standards, can be imposed only if state funds are no longer available. (Gov. Code, § 65995.7.) The Level 2 and Level 3 fees must be justified by a "school facilities needs analysis" ("SFNA") that, unlike a Level 1 justification study, must utilize specific state criteria. The SFNA can be updated as often as necessary, further resulting in potential increases in the fees.

Third, S.B. 50 does not limit the City's ability to develop alternative mitigation for schools. For instance, it is proper for the City to require phasing of construction to address potential school overcrowding or set asides of land under the Subdivision Map Act. (Gov. Code, § 66478.)

Finally, we note that S.B. 50 was the result of State legislation that could be repealed or amended during the build out of the Project. This possibility was not considered by the DEIR, and the DEIR should be clarified to avoid future interpretation suggesting that regardless of future law, only the current S.B. 50 fees will be required.

Therefore, the District requests that the DEIR be amended to address any school impacts that are not addressed by payment of the statutory fee, and that the discussion of S.B. 50 be clarified and corrected.

6. The discussion of Class Size Reduction on page 4.11-19 is not accurate.

The DEIR characterizes the California State Class Size Reduction (“CSR”) program, requiring student loading standards of 20 students to one teacher, as mandatory. In fact, this program is a financial apportionment incentive program, at the election of a school district. (Educ. Code, § 52120, et seq.) It is within a school district’s discretion whether it will opt into the program and receive the associated funding, and thus the program is not a requirement. Additionally, even for school districts participating in CSR, there are exceptions to a strict number of students per teacher ratio. (See, e.g. Educ. Code, § 52122.5, which allows for an “average” of 20 students, under certain circumstances.)

7. The DEIR should consider and analyze the potential impacts related to the high school.

The Project is anticipated to generate an estimated 1,203 high school students within CJUSD. (DEIR, p. 4.11-24.) The DEIR concludes that “[a]ll high school students would attend high schools outside the plan area. For CUSD [sic], the SVSP students would attend Center High School south of the project area.” (DEIR, p. 4.11-24.) CJUSD will rely on the DEIR’s consideration of issues related to high school, such as traffic impacts as students will have to leave the Project area to travel to CJUSD’s existing high school. We would appreciate confirmation that these high school attendance related impacts have been adequately addressed in the current DEIR. We look forward to working with the City and developers to ensure that the traffic and other issues are adequately resolved.

8. The DEIR should analyze the potential cumulative impacts on schools resulting from additional development already approved or pending; specifically, the DEIR should analyze the potential cumulative impact of future development in the Urban Reserve, which will be annexed as part of the Project.

a. Cumulative Impacts Generally

Under CEQA, cumulative impacts must be discussed in an EIR, and that discussion must be adequately detailed and supported by data, regardless of whether a cumulative impact is found or not. (See, e.g., San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1994) 27 Cal.App.4th 713; and Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d 692.) “The requirement for a cumulative impact analysis must be interpreted so as to afford the fullest possible protection of the environment within the reasonable scope of the statutory and regulatory language.” (Citizens to Preserve the Ojai v. County of Ventura (1985) 176 Cal.App.3d 421, 431-432.) The DEIR never discusses in any particularity what the cumulative impacts of development will be on schools. The entire discussion of cumulative impacts on schools consists of two paragraphs essentially stating that school sites will be identified “as needed at the time of development . . .” (DEIR, p. 5-140.) This discussion defers analysis. Both because CJUSD will rely on the DEIR for its own future CEQA analyses and because of the importance of identifying and resolving cumulative impacts, CJUSD must depend on the DEIR’s analysis of these issues.

b. Urban Reserve

The DEIR did not specifically analyzed the potential cumulative impacts of buildout of the Urban Reserve. While the DEIR identifies long-term buildout of the Urban Reserve as a potential “significant impact” on schools, it does not provide any analysis of potential mitigation measures or alternatives. Page 4.11-26 of the DEIR states:

Development of the Urban Reserve would increase the demand for schools. As shown in Figure 4.11.3-1, a majority of the Urban Reserve (eastern portion of Richland) would be within the Roseville School District boundaries. A small area of the western portion of the Urban Reserve (Chan in its entirety and a portion of Richland) would be within the Center School District. Depending on land uses proposed, the number of students could exceed planned capacity for the school districts. This is a significant impact.

To the extent that additional housing may be developed in the Urban Reserve that could generate a need for additional schools and reservation of additional schools sites, other than those identified in the Project, the DEIR should address this potential impact by requiring appropriate analysis when development of the Urban Reserve is proposed.

Conclusion

CJUSD appreciates the opportunity to submit its comments related to the Project. If you have any questions regarding this letter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Loehr", with a long horizontal flourish extending to the right.

Scott Loehr
Superintendent

Matthew L. Friedman, MRP
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Ms. Kathy Pease
City of Roseville
311 Vernon Street
Roseville, CA 95678

Dear Ms. Pease,

Thank you for the opportunity to review, and provide comments regarding the Environmental Impact Report (EIR) for the Sierra Vista Specific Plan (SVSP).

General Comment

The EIR reflects an extensive review of the current and future conditions in south Placer and northern Sacramento counties following the long term build out of the SVSP area, Placer Vineyards, and other major projects. The EIR also reflects the policy and planning documents of the cities of Roseville, Lincoln and Rocklin, the counties of Sacramento, Placer and Sutter, and other entities such as Caltrans. The preparers of the EIR are to be commended for their thorough efforts.

Specific Comments

Transportation and Circulation

The EIR exhaustively identifies the impacts to Level of Service (LOS) that would be caused by the Sierra Vista and other major projects planned throughout the area. It also identifies mitigation as proposed by WMM mitigation measures 4.3-4, 4.3-6, Master Mitigation measures 4.3-2, 4.3-3 and others. These measures reflect careful technical analysis and forward thinking through the establishment of impact fees and interjurisdictional sharing of funds to finance the identified needed improvements. The EIR also repeatedly notes on pages 4.3-84, 4.3-85, 4.3-86, 4.3-89, 4.3-90 and elsewhere that the successful implementation of improvements based on fee revenues lies with interjurisdictional cooperation and that the City of Roseville has no authority over the decisions of Placer County, Sacramento County, Sutter County and the cities of Rocklin and Lincoln. While the EIR analysis correctly assumes a worst case scenario of a failure for the various jurisdictions to reach agreement when analyzing the impacts of the SVSP, it misses an important opportunity to enhance the likelihood that these measures can be implemented. The City of Roseville can and should add a mitigation measure that it will serve as the convening party to create a strong and binding interjurisdictional agreement that would include all of the parties identified in the mitigation measures. Thus it would be much more likely that the improvements listed as mitigation measures in the SVSP, Placer Vineyards, other major development plans, the Roseville Capitol Improvement Program, and others, will be implemented.

While the EIR identifies typical street design and bicycle/pedestrian facilities it does not address neighborhood and local area movement in depth. The construction of cul de sacs without bicycle/pedestrian “cut throughs” and long uninterrupted walls on arterials and collectors increase travel distance and decrease the likelihood of non-auto local travel. This is particularly true for the home to school trip. Increasing the safety and convenience of non-auto facilities for the home to school and home to recreation trips will decrease congestion and air pollution. It will also enhance youth fitness and readiness for daily learning. Therefore, the local circulation, Paseo and bikeway system should be integrated to create a safe and convenient travel option from any point within the SVSP area.

Public Services

The EIR identifies joint use studies between the school districts and the City of Roseville. This recommendation is to be commended and it should be noted that City of Roseville has had a high degree of success in the development of joint use recreational facilities and school facilities. The joint use arrangements have resulted in better facilities with a greater degree of use efficiency and higher levels of activity than would have been possibly had the cooperative agreements not been established. In addition to the benefits mentioned above, joint use facilities create the opportunity for the conserving of land resources and energy. Therefore it would be worth while to broaden the joint use possibilities to include shared use of libraries and co-locating a community college, vocational training or other educational uses. Other communities in the region have successfully co-located libraries and community college facilities with school facilities. In addition it would be worth exploring the leasing of classroom facilities to evening based proprietary educational providers in order to provide a revue stream to the school districts.

The EIR identifies the fact that high school students living within the Center Joint Unified School District (CJUSD) would initially travel a farther distance than students within the Roseville Joint Union High School District. This will change as the Placer Vineyards project and the Riolo Vineyards project are built and a new high school closer to Sierra Vista will be built. This fact should be highlighted to potential residents as children from young families will likely be attending a near by high school.

In addition it would be helpful for the EIR to identify a mechanism whereby an agreement between the school districts would be developed to govern the adjustment of district boundaries to follow the logic of neighborhood street design. Any boundary change should be done in a way that results in no net change in enrollment in any district while at the same time allows for an effective flow of movement to local neighborhood schools.

Thank you for your consideration.

Sincerely,



Matthew L. Friedman

From: Tim Duffy [mailto:tduffy@hga.com]
Sent: Thursday, November 19, 2009 1:52 PM
To: Plan Ext Email Dist List
Subject: Sierra Vista Specific Plan question

Good afternoon.

I am a citizen of Roseville and live just to the east of the Sierra Vista Specific Plan. I am taking my first pass through the EIR draft and what immediately caught my eye is that there are 6 stoplights planned between Fiddymment Road and Watt Avenue on Baseline Road. This is an extremely high amount of stoplights for what is currently a high speed road with few stoplights. I understand that the intention is to slow down cars for the proposed commercial area but this is going to drop the speed of Baseline Road to a standstill. Considering this is a very popular circulation route for many Sacramento commuters this change would have a devastating effect. I would like some more information regarding this decision.

I will also be at the December 10th Planning Commission meeting to discuss this.
Thanks,

Tim Duffy, AIA, LEED AP BD+C
Associate

HGA Architects and Engineers
1410 Rocky Ridge Drive, Suite 250, Roseville, CA 95661
Direct 916.787.5143 | Fax 916.784.7738
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AIACC AEP - Young Architects Forum Director North
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DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

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(800) 735-2929 (TT/TDD)
(800) 735-2922 (Voice)



DEC 11 2009

December 8, 2009

File No.: 220.12336.11784.SCH#2008032115

Ms. Kathy Pease, Senior Planner, AICP
City of Roseville Planning and Redevelopment Department
311 Vernon Street
Roseville, CA 95678

Dear Ms. Pease:

Recently, the California Highway Patrol (CHP) Auburn Area had the opportunity to review the Sierra Vista Specific Plan, Draft Environmental Impact Report SCH#2008032115. We believe the growth discussed will have a major impact on the mission of the CHP of providing safety and service to the public as they use the highway transportation system within Placer County. The project as outlined will substantially increase traffic volume and impact the State highways and roadways within the southern portion of Placer County, primarily Interstate 80 (I-80), State Route 65 (SR-65), west of Fiddymont Road, north of Baseline Road to approximately ½ mile west of the intersection of Watt Avenue, and south of the West Roseville Specific Plan.

The effect this project will have on the Auburn CHP Area could be significant in the number of residents it will attract. The proposed plan encompasses approximately 2,064 acres of land currently in the City of Roseville and western Placer County. The plan calls for the construction of 6,650 dwelling units, with a possible increase of 25,219 new residents and 2,419,113 square feet of retail and office uses, resulting in approximately 5,821 jobs. The project would also provide sites for construction of four elementary schools, one middle school and a fire station. This project will contribute a significant amount of traffic volume on regional roadways and intersections that would exceed their current capacity.

The Auburn CHP Area office is responsible for more than 800 square miles of area in west Placer County, which includes I-80, S.R. 49, S.R. 193, S.R. 65, and over 1,100 miles of county roadways. We are committed to providing the maximum amount of service and traffic enforcement allowable with our current staffing levels. This project will impact our ability to provide traffic law enforcement services, unless additional staffing is allocated to patrol this project.

There are no immediate plans to augment the workforce in the Auburn CHP Area Office, nor are there any major roadway projects to significantly increase the traffic capacity of I-80 or SR-65. This is an area that should be discussed as this project, along with several other major developments within the immediate vicinity, will have a major impact on traffic.

Ms. Pease
Page 2
December 8, 2009

I-80, which bisects the City of Roseville, is currently operating at or near maximum capacity. During certain times of the day, I-80 is beyond capacity resulting in gridlock or near gridlock as traffic flows at a seriously reduced speed in both directions. Furthermore, SR-65, which is located on the north edge of Roseville, has already experienced a major increase in usage due to the growth from the cities of Lincoln, Roseville, Rocklin and unincorporated Placer County. Any significant increase in growth will further adversely affect these major routes of travel.

We thank you for allowing our comments regarding the Draft Environmental Impact Report for the Sierra Vista Specific Plan. Through cooperative partnerships with local, county and State entities the CHP will continue to monitor the growth within western Placer County and the surrounding cities for its impact on the CHP's mission.

Sincerely,

A handwritten signature in black ink, appearing to read "W. L. Donovan", with a long, sweeping underline.

W. L. Donovan, Captain
Commander
Auburn Area

cc: Assistant Chief M. S. Champion, Valley Division
R. M. Nannini, Special Projects Section



Municipal Services Agency

Department of Transportation

Michael J. Penrose, Director

Steven Szalay, Interim County Executive

Paul J. Hahn, Agency Administrator

County of Sacramento

January 5, 2010

Ms. Kathy Pease
City of Roseville
Planning & Redevelopment Department
311 Vernon Street
Roseville, California 95678

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
FOR THE SIERRA VISTA SPECIFIC PLAN**

Dear Ms. Pease:

The Sacramento County Department of Transportation has received a notice of public hearing & availability of a DEIR for the Sierra Vista Specific Plan. We appreciate the opportunity to review the DEIR for this project. We have completed the cursory review of the DEIR and have the following comments to offer:

Page 4.3-94. Mitigation Measure 4.3-4. As stated in the report, the Sierra Vista Specific Plan project has an impact on Watt Avenue south of PFE Road. With the addition of project traffic, the LOS results change from an acceptable LOS E standard to an unacceptable LOS F standard. The report considers this as a significant impact and proposes to mitigate the project's impact by paying a fair share towards the mitigation measure. But, according to the Sacramento County significant impact criterion, if the addition of project traffic results in a change in LOS on a roadway/intersection facility from an acceptable LOS standard (LOS E or better) to an unacceptable LOS standard (LOS F) in the existing condition then the project proponent is 100% responsible for the construction of feasible mitigation measure. Please revise the fair share to 100% share in the FEIR as this impact is solely caused by this project. We urge that the City of Roseville enter into an agreement with the County of Sacramento to implement this mitigation measure. Please contact Department of Transportation, Chief, Dan Shoeman at 916-874-6222 or shoemand@saccounty.net and County Engineering Chief, Bob Davison at 916-874-6926 or davisonb@saccounty.net to initiate this agreement.

Page 4.3-153. Table 4.3-29. As shown in this table, the project results in an impact at the intersection of Watt Avenue and Antelope Road during the AM and PM peak hour under the 2025 plus project scenario. Since the change in V/C ratio is not more than 0.05 at this intersection (which will be operating at LOS F during the AM and PM peak hour under the 2025 without project scenario); therefore, according to the County's significant impact criterion, the impact is considered as a less than significant impact and no mitigation measure will be necessary. Please correctly reflect this change in the FEIR.

"Leading the Way to Greater Mobility"



Design & Planning: 906 G Street, Suite 510, Sacramento, CA 95814 . Phone: 916-874-6291 . Fax: 916-874-7831
Operations & Maintenance: 4100 Traffic Way, Sacramento, CA 95827 . Phone: 916-875-5123 . Fax: 916-875-5363
www.sacdot.com

Ms. Kathy Pease
January 5, 2010
Page 2

Should you have any questions, please feel free to contact me at (916) 875-2844 or atwalk@saccounty.net.

Sincerely,

A handwritten signature in black ink that reads "Kamal Atwal". The signature is written in a cursive style with a large, stylized initial "K".

Kamal Atwal, P.E., T.E.
Associate Transportation Engineer
Department of Transportation

KA:ka

c: Matt Darrow, DOT
Dean Blank, DOT
Dan Shoeman, DOT
Mary Anne Dann, MSA
Bob Davison, County Engineering



COUNTY OF PLACER

**AGRICULTURAL COMMISSIONER
SEALER OF WEIGHTS & MEASURES**

CHRISTINE E. TURNER
Agricultural Commissioner/Sealer

11477 E AVENUE, AUBURN, CALIFORNIA 95603
TELEPHONE: (530) 889-7372
FAX: (530) 823-1698
www.placer.ca.gov

December 31, 2009

TO: Kathy Pease, Senior Planner, Planning Department, City of Roseville
FROM: Josh Huntsinger, Deputy Agricultural Commissioner, Placer County
SUBJECT: **Sierra Vista Specific Plan Public Draft Environmental Impact Report (EIR)
dated November 5, 2009**

Attached is a copy of the letter that was submitted by Christine Turner, Placer County Agricultural Commissioner, on September 18, 2009, regarding the Sierra Vista Specific Plan Administrative Draft EIR dated August, 2009.

The concerns addressed in that letter regarding the Sierra Vista Specific Plan's potential impacts to agriculture remain as the City of Roseville moves forward with the Public Draft EIR.

I request that you include Christine Turner's original comments, dated September 18, 2009, in your consideration of this latest draft of the Sierra Vista Specific Plan EIR.

cc: Christine E. Turner

5 Pages



**PLACER COUNTY DEPARTMENT OF
AGRICULTURE
WEIGHTS AND MEASURES**

11477 E Avenue, Auburn, CA 95603-2799 (530) 889-7372 FAX (530) 823-1698

CHRISTINE E. TURNER
Agricultural Commissioner/
Sealer of Weights and Measures

September 18, 2009

TO: Kathy Pease, Senior Planner, Planning Department, City of Roseville

FROM: Christine Turner, Placer County Agricultural Commissioner

SUBJECT: **Sierra Vista Specific Plan Administrative Draft Environmental Impact Report (ADEIR) dated August 2009**

Thank you for allowing me to submit comments on the City of Roseville's Sierra Vista Specific Plan Administrative Draft Environmental Impact Report (ADEIR), dated August 2009, as we discussed on September 16, 2009. As I indicated to you in our conversation, I am concerned about the impacts this specific plan project will have on the agricultural resources of the site.

ADEIR Project Description

"The proposed Sierra Vista Specific Plan (SVSP) project site is approximately 2,064 acres located in unincorporated Placer County. The project site is characterized by gently rolling topography and large, open annual grassland areas. The Placer County General Plan currently designates most to the project site as Agriculture/Timberland, 80-acre minimum. The SVSP is designated in the Placer County Zoning Ordinance as Farm Combining Building Site, 80-acre (FB-X-80). The majority of the proposed project site is undeveloped and has historically been used for agricultural or [livestock] grazing activities. The California Department of Conservation (CDC) classifies the project site a Farmland of Local Importance."

Farmland of Local Importance

California Department of Conservation definition of Farmland of Local Importance:
"Farmland of Local Importance is land of importance to the local economy, as defined by each county's local advisory committee and adopted by its Board of Supervisors. Farmland of Local Importance is either currently producing, or has the capability of production, but does not meet the criteria of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. Authority to adopt or to recommend changes to the category of Farmland of Local Importance rests with the Board of Supervisors in each county."

In Placer County, Farmland of Local Importance is those farmlands "not covered by the categories of Prime, Statewide, or Unique. They include lands zoned for agriculture by County Ordinance and the California Land Conservation Act as well as dry farmed lands, irrigated

pasture lands, and other agricultural lands of significant economic importance to the County and include lands that have a potential for irrigation from Placer County water supplies."

Section 4.1 Land Use and Agricultural Resources

Section 4.1 Land Use and Agricultural Resources, Page 4.1-10: Most of the soils in the project area are Class II, III and IV, "which severely limit agricultural production" is a misleading statement. How productive agricultural soils are greatly depends on what crop is grown on them and how they are managed. Much of the soils in the project area have slow to very slow permeability and USDA, Soil Survey of Placer County, Western Part, states that these soils are suitable for rice production, which requires poorly drained soils. The fact that there is currently no rice production in this area does not diminish the value of the soil as an agricultural resource. In addition, the Soil Survey also lists the soils in the project area as suitable for winter grain production, irrigated pasture and rangeland livestock grazing. In fact, the existing agricultural land uses include "ongoing dry farming activities," limited strawberry production, and livestock grazing.

Section 4.1 Land Use and Agricultural Resources, Page 4.1-47: The statement, "For the purposes of this EIR, a significant impact would occur if development proposed in the project area would do any of the following:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use..."

This statement arbitrarily limits the *Significance Criteria* to exclude Farmland of Local Importance and fails to recognize the economic value of the agricultural land resource base.

In the same section, continued on **Page 4.1-48**, the next bullet states,

- "Involve other changes in the existing environment, which due to their location or nature, could result in the conversion of Farmland to non-agricultural uses (i.e., sensitive uses such as residential uses adjacent to agricultural, which could result in a restriction on agricultural activities)."

The Sierra Vista Specific Plan project will "involve changes in the existing environment" and convert 2,064 acres of agricultural land to non-agricultural uses and is therefore a significant impact to be considered for appropriate mitigation.

Section 4.1 Land Use and Agricultural Resources, Page 4.1-62, Agricultural uses, skims over the potential incompatibilities with adjacent agricultural land uses and ignores the need to incorporate appropriate land use buffers. This response is based on the assumption "that these [adjacent] lands would be urbanized in the future; therefore, in the long-term, no incompatibilities with agricultural land are anticipated." Land use buffers are an important tool to help protect agricultural operations from the negative impacts of adjacent development. Lands adjacent to the SVSP project (Richland and Chan Urban Reserves and County land) that can still be used for agricultural purposes cannot be assumed to be compatible in the short-term and appropriate buffers need to be considered.

Section 4.1 Land Use and Agricultural Resources, Page 4.1-65, Conversion of Agricultural Land, Impact 4.1-5 Table, states that the project's impact is "Less Than Significant" and no mitigation is required for the Conversion of Agricultural Land to Developed Uses under the Applicable Policies and Regulations. In the same section, **Page 4.1-66**, it states, "Although the proposed land use designation would preclude any agricultural use of the land, the loss of grazing land would not be significant." I disagree with this conclusion and the reasons cited to support it.

It is further stated on **Page 4.1-66**, "Conversion of Farmland of Local Importance is not considered significant because of:

- (1) relatively low value of the property for agricultural purposes as defined by the Farmland Mapping and Monitoring Program,
- (2) its historically poor ability to produce agricultural crops,
- (3) its abundance in the region, and
- (4) it does not exceed a CEQA standard of significance (Appendix G).

This is considered a Less Than Significant Impact."

As the Agricultural Commissioner for Placer County, I must disagree with this conclusion and the four reasons cited to support it.

First, the California Department of Conservation's Farmland Mapping and Monitoring Program recognizes the value of Farmland of Local Importance as "land of importance to the local economy" and is land that "is either currently producing, or has the capability of production." The Farmland Mapping and Monitoring Program "produces maps and statistical data used for analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. The maps are updated every two years with the use of a computer mapping system, aerial imagery, public review, and field reconnaissance. The program does not define the value of property for agricultural purposes.

Second, "its [the SVSP project site] historically poor ability to produce agricultural crops" is not supported or relevant in an evaluation of the soils as a significant part of the agricultural land resource base. As previously stated, much of the soils in the SVSP project area are suitable for rice production, the same as other areas of western Placer County, specifically because of their slow permeability. Rice production is the top crop in Placer County with a value of over \$14 million dollars in 2008. Similar soils to those found on the SVSP project site are producing 2.8 to 3.3 tons of rice per acre. The soils in the SVSP have the same resource potential for rice production.

Third, the statement, "its [Farmland of Local Importance] abundance in the region" is not quantified or supported. According to the Farmland Mapping and Monitoring Program, in 1992, Placer County had 113,464 acres of Farmland of Local Importance. In 2006, their most recent published statistics indicates Placer County has 101,847 acres of Farmland of Local Importance, reflecting a decline of 11,617 acres. Based on subsequent development in western Placer County, I believe the pending 2008 farmland report will show an even greater decline.

Fourth, the statement, "it does not exceed a CEQA standard of significance (Appendix G)" does not appear to be consistent with statements in Section 5.0 CEQA Considerations of the SVSP ADEIR. Specifically, **Page 5-1** states, "Section 15126 of CEQA guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment... As part of this analysis, the EIR must also identify:

- Significant environmental effects of the proposed project
- Significant environmental effects that cannot be avoided if the proposed project is implemented

- Significant irreversible environmental changes that would result from the implementation of the proposed project
- Growth-inducing impacts of the proposed project
- Mitigation measures proposed to minimize significant effects"

In addition, "Section 15126 (b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Significant impacts that cannot be avoided if the project is approved include:

- Potential incompatibility of adjacent agricultural land uses"

Therefore, appropriate land use buffers between development and the adjacent agricultural land uses need to be included in the public draft EIR. More importantly, the public draft EIR needs to recognize that the conversion of 2,064 acres of agricultural land to the level of development proposed in the Sierra Vista Specific Plan ADEIR is a "significant irreversible environmental change" under CEQA and mitigation measures need to be proposed to minimize the significant impacts.

Further, Page 5-2, Cumulative includes,

- "Contribution to the loss of agricultural land"

Page 5-20, **Agricultural Land Conversion**, recognizes that, "Because farmland is being lost to development throughout south Placer County and the region, the loss of farmland and agricultural productivity would be cumulatively considerable and would result in a **significant and unavoidable impact**. The SVSP includes substantial offsite mitigation for grassland to reduce impacts to Swainson's hawk. Agricultural resources are not always equivalent to biological resources and therefore the number of acres acceptable biological resource mitigation may not be enough to provide 1:1 agricultural resource mitigation.

Other large development projects, like Placer Vineyards and the Regional University, both incorporated 1:1 offsite mitigation for the loss of agricultural land (of equal or greater value). The agricultural mitigation land also needs a water supply to support a reasonable level of agricultural activity consistent with the intent of mitigating the impact of the development.

Please feel free to contact me directly if you have any questions regarding these comments on the Sierra Vista Specific Plan Administrative Draft Environmental Impact Report.

PLACER COUNTY LOCAL AGENCY FORMATION COMMISSION

145 Fulweiler Ave, Ste 110, Auburn, California 95603 530-889-4097 FAX: 530-886-4671 lafco@placer.ca.gov

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Commission

William Wright
LAFCO Counsel

January 7, 2010

Kathy Pease, AICP
Senior Planner
City of Roseville Planning Department
311 Vernon Street
Roseville, CA 95678

RE: Sierra Vista Specific Plan Draft Environmental Impact Report

Dear Ms. Pease:

Thank you for the opportunity to review the Sierra Vista Specific Plan Draft Environmental Impact Report. Placer LAFCO is considered a Responsible Agency, and will utilize the EIR in evaluation of any proposals and sphere amendments, depending on various options outlined in the EIR.

The EIR appears adequate for review of proposals that may be required by Placer LAFCO.

In general, LAFCO is primarily concerned with encouraging the orderly formation of local government agencies, preservation of agricultural and open space, and to discourage urban sprawl.

Please feel free to contact Kris Berry, Executive Officer regarding any questions you may have and to facilitate the submittal of any proposals.

Sincerely,

Kristina Berry, AICP
Executive Officer



PLACER GROUP
P.O. BOX 7167, AUBURN, CA 95604

January 7, 2010

Sent via email: kpease@roseville.ca.us

Attn: Kathy Pease
Planning and Redevelopment Dept.
City of Roseville
311 Vernon St.
Roseville, CA 95678

Ladies and Gentlemen:

RE: Comments—Sierra Vista Annexation, General Plan Amendment, Zoning, Etc., Draft Environmental Impact Report

Thank you for the opportunity to comment on the Sierra Vista (SV) Draft Environmental Impact Report (DEIR).

In general, we submit that this proposal violates Roseville's General Plan elements; that there is no need for an amendment to incorporate a change in boundaries in order to artificially create a justifiable sphere of influence (SOI), or to adopt a Sierra Vista Specific Plan (SVSP), or to annex the entire 2,000+ acres (all to eventually accommodate 6,663 dwelling units or a population increase of over 17,000¹); and that the subsequent loss of agricultural (ag) lands due to the scale of this proposal is unacceptable. The proposal appears to be an overzealous expansion of an already over-built, excessively entitled, under-served region.

Development decisions should be driven in part by an adherence to principles of logical and orderly growth; however, this proposal appears to construe "orderly growth" with rampant growth. The Project Description section of the SVSP suggests that this expansion "...accommodates Roseville's share of future regional population growth...." Who/what entity decided (1) regional population growth numbers and (2) the distribution "share" ratios of that population growth?² Please cite valid authoritative studies to justify (1) real regional population growth figures; (2) the process by which each jurisdiction was doled its "share"; and (3) how that "share" portion was distributed. What is Roseville's current "share"? What is the basis for deciding that continuous expansion is being driven by Roseville's "share"? What "share" will the County of Placer have? Please compare the "share" of Roseville's population growth to the "shares" of Loomis, Colfax, or even Rocklin, and explain how this project objective was calculated and can be justified.

¹ Using 2.6 persons per EDU.

² SACOG's "Blueprint" should not be used as the "Bible" for regional growth in forecasting population models. SACOG is composed of the very people who approve these types of projects, proposals, and developments. Thus, they have inherent conflicts of interest in possibly inflating all regional growth predictions to justify their votes of approval of any/all/most development proposals that come before them ("SACOG Blueprint supports this, so we do too").

The Project Description suggests that 2.6 millions gallons of water per day (mgd) will be drawn from two wells to augment the “looped distribution system” during dry years. Please address the potential for the primary (“looped”) system’s inability to meet demand, which is likely. Please explain how the certainty of the primary water system’s supply has been ascertained, and how the 2.6 mgd of ground water backup can be assured. What impacts will the 2.6 mgd wells have on ground water tables (especially with surrounding ag land uses and creek flows³)?

General Plan Violations

Under Land Use Element (Section C, Goals and Policies, Roseville General Plan, page 11-28), Goal 1 states that Roseville’s will be identified by (b) “A commitment to preserving its small town attributes and cultural heritage....” (d) “Residential development that includes clusters of high to low densities balanced with large expanses of open space.” Please explain how the SVSP meets these Goals of the General Plan.

Under Growth Management (page 11-45), Goal 2 states that “the City shall encourage a pattern of development that...preserves valuable natural and environmental resources.” Goal 4 states that “the City shall continue a comprehensive, logical planning process, rather than an incremental, piecemeal approach.” Please explain how such massive plans as the SVSP, encompassing thousands of acres where both natural and environmental resources will not be preserved, and when so many other years of entitlement have yet to be built out, can be construed to meet these Goals of the General Plan.

The SVSP violates Goal 7 or does not meet its intent because it is unclear how the long-term carrying capacities and limits of roadways, sewer and water treatment (especially with the multitude and apparently on-going violations of Pleasant Grove Wastewater Treatment Plant’s discharges⁴) can be met.

The SVSP states that Development Agreements will be for 20-year terms. This is an inappropriate timeline and gives an undue advantage to landowners over the City, with usually no penalties for non performance, other than a possible reversion of zoning. To insure performance, 10-year Development Agreements are more reasonable to protect the interests of the citizens of the City, with performance bonds included. There should be “no surprises” in a decade, but if there are unforeseen impacts, the City should have the right and the responsibility to make amendments and renegotiate any Development Agreement.

Alternatives

Alternative 1, No Project, is the most desirable given the region and nation’s uncertain economic climate, and future impacts of climate change and global unrest. The current land use designations would better meet the critical needs of a city the size of Roseville in the event of global economic shut down. Please consider and analyze the benefits of waiting until the “crises” passes (climate change, economic uncertainty,

³ Drawing down ground water tables can impact creek flows by decreasing them substantially. Sloto, R.A., 2008, Effects of land-use changes and ground-water withdrawals on stream base flow, Pocono Creek watershed, Monroe County, Pennsylvania: U.S. Geological Survey Scientific Investigations Report 2008-5030, 38 p.

⁴ Per California Water Resources Control Board, http://www.swrcb.ca.gov/rwqcb5/board_decisions/adopted_orders/placer/r5-2009-0542_enf.pdf

population declines in California, and the potentially critical need for ag lands) before proceeding with this SVSP as a more prudent and wiser path to follow.

Another unacceptable aspect of this project concerns the extremely high number of impacts that are deemed significant and unavoidable (34). When added to the list of over 20 potentially significant impacts for which mitigation is available, regardless of the viability or merit of those mitigation measures, it becomes clear that this is a proposal that should not be approved.

4.1—Land Use and Agricultural Resources

One of the most disturbing aspects of this proposal is the loss of ag lands. It is little consolation that ag uses will continue until development is proposed. In addition to the discussion in the Draft Environmental Impact Report (DEIR) on ag, please analyze the economic loss from conversion of ag lands in the future on the already-entitled ag lands. Please analyze food sustainability in terms of the loss this project will inflict on future local food production resources.

As transportation costs increase and local ag products become more desirable and affordable (as opposed to costly importation of food), please examine the impact to the public and the ag industry on the loss of these ag acres. What will be the economic impact of build out both from the standpoint of loss of local food sources and the need to import food from great distances?

Other

Possibly indicative of the overreaching magnitude of this proposal is the withdrawal of at least two of the original property owners (Richland Communities and Chan-DEIR, p. 4.1-2) from the project. With no “specific land uses” proposed for these parcels, how is it justified to give those properties “Urban Reserve” land use designations? What criteria and/or authority can be cited to designate an additional 400 acres as Urban Reserve? The change may result in less proposed development, but it is almost certain that the land will eventually be developed and should be included in the environmental impact discussions of the SVSP.

Given the excessive annexation and entitlement approvals by Roseville, build out would appear to be much longer than ten years out. One estimate by a county supervisor was that Roseville’s current entitlements would take 18 years to fulfill. Please explain how the “fully entitled” residential development within the City of Roseville can be “anticipated to be built out by 2020.” (p. 4.1-4).

In the late ‘80’s and early 90’s, Roseville’s SOI was much more reasonable and justifiable. Its population and growth did not necessarily convert thousands of acres of viable farmland to roads and rooftops, destroy wetlands and vernal pools, or create air and water pollution. Yet as stated in the DEIR, the SVSP project was “identified as one of two ‘Remainder Areas’ analyzed,” and the SOI was extended. We submit that the “constraints” mentioned have been ignored. Please explain how the statement that includes “growth issues and the unique constraints...provide a context within which implementation...can be successfully accomplished” (p.4.1-4) can be substantiated. Is destruction of wetlands, vernal pools, and conversion of ag lands considered a component of the “successfully accomplished” statement? How is successful implementation measured? Who set the standards for “successful”? Do those standards include rigorous

mandates to protect and preserve natural resources? And if so, how does the SVSP meet them?

The NRCS soils suitability ratings are for general agriculture, but the SVSP land areas are viable crop- and livestock-supporting ag lands. They can produce sustainable and diverse crop yields to help feed the region's population. Please discuss (1) the ag crop yield potential in light of feeding the region's citizens; (2) the impact of the loss of that food production potential with the SVSP proposal, both from an economic standpoint of citizens and from their health and survival.

The "Constraints Map" indicates the fragile nature of the SVSP proposal area and the multitude of important natural resources (many important drainage systems, wetlands, vernal pools) that must be protected. It also indicates constraints that can put people at health and safety risks (the proposed gas line, flood plains, transmission lines, and McClellan air flight corridor) which must be avoided with buffers. Thus, there is little land remaining that should even be considered for a SVSP. The SVSP requires a broad brush, sweeping approval of lands that are not conducive to development. How can the SVSP be justified given both the natural resource and health and safety constraints?

Our own constraints of time coupled with the gargantuan proposal this SVSP represents prohibit us and probably most other members of the public from giving it the thorough review it deserves. We urge you to either not approve proposal or at least postpone any vote to approve.

Cordially,



Marilyn Jasper, Chair

marilyn.jasper@mlc.sierraclub.org

DEPARTMENT OF TRANSPORTATION

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January 7, 2010

09PLA0021
SCH #2008032115
Roseville Sierra Vista Specific Plan
Draft Environmental Impact Report (DEIR)

Kathy Pease
City of Roseville
311 Vernon Street
Roseville, CA 95678

Dear Kathy Pease:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report for the Sierra Vista Specific Plan. This project, amendment to the City's sphere of influence boundary of approximately 373 acres and an annexation of approximately 2,064 acres of vacant land generally located west of Fiddymont Road and north of Baseline Road. The applicant also requests a General Plan Amendment and adoption of a new Specific Plan to establish residential, commercial, parks, open space, and public land use designations, a zoning Ordinance Amendment to establish development standards for each parcel and to amend the City's Residential (RS) Development Standards. Our comments are as follows:

Appendix D and E:

Based on the local roads of Existing plus Project Figure-7 in Appendix D, Average Daily Traffic (ADT) Volumes are increasing. Hence, ADT volumes on freeway Existing plus Project should be increase.

State Route (SR) 65 Northbound off at Blue Oaks Boulevard (Peak Hour intersection # 146 page 25), the AM Peak Hour and PM Peak Hour configurations are not corresponding. Therefore, the peak hour volumes are incorrect.

The TIS did not provide information on the Truck percentages used for the Freeway and Ramp Level of Service (LOS) Analysis for I-80, SR 65, and SR-70 mainlines and ramps.

Please verify and revise the forecast volumes and LOS reported in the appendices. These volumes and mismatching figures might cause significant impacts and major flaws in the Final Environmental Impact Report's (FEIR) mitigation measures.

Please provide us with revisions to all documentation for further review.

Kathy Pease
January 7, 2010
Page 2

As this project continues please provide our office with copies of further action and/or documents pertaining to this matter. If you have any questions regarding these comments please do not hesitate to contact Aaron Cabaccang, Aaron_Cabaccang@dot.ca.gov, (530)741-5174.

Sincerely,

A handwritten signature in cursive script that reads "Richard Helman".

Richard Helman, Chief
Office of Transportation Planning - East

c: Steven Vo, Travel Forecasting



WESTERN PLACER
WASTE MANAGEMENT AUTHORITY

JOHN ALLARD, ROSEVILLE, CHAIRMAN
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JAMES DURFEE, EXECUTIVE DIRECTOR

January 7, 2010

Kathy Pease, AICP
City of Roseville Planning Department
311 Vernon Street
Roseville, CA 95678

**RE: SIERRA VISTA SPECIFIC PLAN - DRAFT ENVIRONMENTAL IMPACT
REPORT (DEIR)**

Dear Ms. Pease:

Thank you for providing the Western Placer Waste Management Authority (WPWMA) with the opportunity to review the above mentioned DEIR. The WPWMA is a regional agency that owns and operates the Materials Recovery Facility (MRF) and Western Regional Sanitary Landfill.

WPWMA staff had the opportunity to comment, in writing and via conference call, on many areas of the administrative draft EIR. Thank you for addressing many of our comments.

Our remaining comments are as follows:

Executive Summary

1. Page 3-26 – Table 3-1, *Summary of Impacts and Mitigation Measures* – Under Mitigation Measures, there are several references to the WRSP Landfill that should be spelled WRSL.

4.12.4 Solid Waste – Public Utilities: Environmental Setting

2. Page 4.12.4-2 – Refers to the composting annual processing capacity as 6,000 tons; the annual processing capacity is 60,000 tons.
3. Table 4.12.4-1, *2008 Solid Waste Generation Detail (tons)* – As previously discussed, the WPWMA diversion totals were obtained from data provided by WPWMA, to the City, for CIWMB Annual Reporting purposes. As such, some of the diversion categories overlap; for example, the total MRF diversion of 52,215.1 tons includes both recovery from the MRF sorting lines

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and source-separated deliveries of various material types – some of which are listed separately in the table (e.g. tires, scrap metal, biomass). Double counting of diversion can result in an over-estimate of waste generation; however since the DEIR already established that the project would shorten the life of the landfill and therefore be considered a significant impact, refining the accuracy of the data may not alter the conclusions. However, if interested, WPWMA staff is available to discuss how to best summarize diversion to avoid double counting.

Impact 4.12.4-1 – Increased Demand for Solid Waste Services at the MRF

4. Page 4.12.4-10 – The 2nd paragraph needs to make the distinction between design capacity (2,200 tpd) and permitted capacity (1,750 tpd). As currently written, the term "permitted" should be replaced with the term "designed" or "design".
5. Page 4.12.4-11 – The 2nd sentence in the 2nd paragraph states "...the permitted capacity of the MRF has increased from 1,900 tons per day to 2,200 tons per day." This statement used incorrect permit data; correct information is as follows: the WRSL is currently permitted at 1,900 tpd, the MRF is permitted at 1,750 tpd, and the MRF's design capacity is 2,200 tpd.
6. Page 4.12.4-12 –
 - a. Corrections to the 2nd paragraph – "According to WPWMA staff...one cubic yard of landfill space."
 - b. The 3rd paragraph refers to Mitigation Measure MM 4.12.4-1, which cannot be found in the list of Mitigation Measures in the Executive Summary; I believe the writer intended to refer to WMM 4.11-7, Landfill Expansion.
 - c. The 3rd paragraph also states that the impact is considered Less Than Significant; it should state the impact is Significant and Unavoidable.

Impact 4.12.4-4 – Construction Debris Demand for Solid Waste Services

7. Page 4.12.4-14, 15 – The impact analysis, to a limited extent, addresses the impacts to the landfill; however it fails to address impacts on the MRF.

Although diverting 50 percent of construction debris would lessen the impact to the landfill, it would not necessarily lessen the impact to the MRF (materials may be delivered to the MRF for processing). Therefore, the analysis does not fully justify the reduction in significance to *less than significant*. The

analysis, as well as WMM 4.11-11, should address the impacts to both the landfill and MRF.

Mitigation Measure WMM 4.11-7 – Expand the Landfill

8. Page 4.12.4-15 – The DEIR states, in WMM 4.11-7, that collection fees shall be paid to the City of Roseville, a portion of which shall be used to service bonds necessary to fund landfill expansion. Please provide additional clarification on the fees and bonds; e.g.

- a. What are the fees; are they the normal fees customers pay or a separate fee reserved specifically for funding landfill expansion, and
- b. What are the bonds and how will Roseville bonds relate to funding an expansion of the WPWMA facility.

Thank you again for the opportunity to review the DEIR. Should you have any questions please do not hesitate to call me at 530-886-4965 or Eric Oddo, Senior Civil Engineer, at 916-543-3984.

Sincerely,



Chris Hanson
Senior Planner

cc: Bill Zimmerman, Program Manager
Eric Oddo, Senior Civil Engineer



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MOTHER LODGE CHAPTER

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January 7, 2010

Kathy Pease
Planning and Development Dept.
City of Roseville
311 Vernon St.
Roseville, CA 95678

RE: Comments on the Draft EIR for the Sierra Vista Specific Plan

Dear Ms. Pease,

On behalf of the Mother Lode Chapter of the Sierra Club, thank you for the opportunity to comment on the Draft Environmental Impact Report for the Sierra Vista Specific Plan. The focus of these comments is on vernal pool resources and the special-status species associated with them. There are a number of problems with the DEIR in this regard.

Originally it was our understanding that this was to be a combined EIR/EIS, an approach which we support. In projects such as SVSP, when significant federally protected resources are to be impacted, it is most appropriate to combine the NEPA and CEQA analysis to provide the mitigations that will meet both CEQA requirements and those needed to obtain federal permits. Otherwise if there is a gap between the two environmental review processes, the decision makers and the public cannot know what the project's mitigations will ultimately consist of at the time the project is approved. In this case it appears that the City of Roseville has been unable to reach agreement with the federal agencies and the ultimate mitigations are deferred, defeating the purpose of CEQA. If the City of Roseville approves this project under a cloud of disagreement with the federal agencies, it sets up a lengthy, costly and inefficient struggle between local government and federal agencies that serves the interests of virtually no one.

In analyzing the onsite vernal pool resources the DEIR focuses exclusively on wetted acres and fails to recognize that nearby uplands are critical to the biological function of vernal pools. It is noted that the project contains 10.6 acres of "vernal pool habitat." (Pg. 4.8-45) Yet a resource inventory done for Placer Legacy by North Fork Associates (one of the consultants for this DEIR) identified 871 acres of vernal pool complexes on the project site, based on aerial surveys. Either those surveys should have been used in the DEIR, or on the ground surveys done to establish the extent of the uplands that are hydrologically and vegetatively essential to the function of the various vernal pools. Instead, the DEIR assumes the absence of indirect impacts to vernal pools if there is no development within 250 feet. This method is arbitrary and biologically indefensible.

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Regarding the presence or absence of federally listed species in the site's vernal pools, the DEIR is off the mark in two respects. It is not appropriate to distinguish between those vernal pools that are 'Shrimp-Habitat' and those that are 'Non-Shrimp Habitat.' The ability to detect with certainty the presence or absence of vernal pool fairy shrimp or vernal pool tadpole shrimp in any given vernal pool is virtually impossible, since it can vary year to year according to the conditions and the timing of the surveys. That is why the USFWS has a policy of 'presumed presence' of both fairy shrimp and tadpole shrimp in Western Placer County. The DEIR must likewise assume the presence of both listed species – it must not (as it does) provide lesser mitigation for vernal pools deemed to be Non-Shrimp Habitat.

Mitigation of impacts to those vernal pools referred to as 'Non-Shrimp Habitat' inappropriately provides for the creation of vernal pools. The ability to create functioning vernal pool systems is unproven and has not been accepted by the USFWS. Even genuine restoration of vernal pools often fails. Even where apparently successful, such efforts have not yet satisfied biologists that they will retain biological function over time.

Ratios: Although the Army Corps typically requires that wetlands be preserved at a 2:1 ratio, plus 1:1 creation to reach 'no net loss,' vernal pools are more complex ecosystems and should be treated differently, particularly given the uncertain science of restoration. The DEIR should provide for a 3:1 ratio of preservation, plus 1:1 restoration. That would guarantee no more than a 25% rate of loss of this vanishing habitat, which is home to multiple threatened and endangered species.

Impacts to vernal pools are not treated in a manner consistent with the City's 2000 MOU with the USFWS. That agreement calls for 'a long-term habitat conservation program (HCP), or its equivalent.' Such a conservation program is based on the preservation of existing resources, rather than relying on creation or restoration. Setting aside the fact that the DEIR grossly under-represents the site's vernal pool habitat (10.6 acres versus 871 acres, as noted previously), what little mitigation is provided relies heavily on creation/restoration (48.4 ac), versus on/offsite preservation (7.1 ac).

We urge the City of Roseville not to certify this flawed DEIR and its inadequate mitigations for the loss of vernal pool habitat. Approval of the project with the current mitigations only sets up a more confrontational environment with the federal agencies. Ideally Roseville would become a partner in the Placer County Conservation Plan, adoption of which would merge the CEQA and NEPA processes, providing greater efficiency and certainty for the City, developers and the environmental community regarding the mitigation that we can expect for impacts to vernal pools.

Thank you for the opportunity to comment on the DEIR for the Sierra Vista Specific Plan. Please keep me informed of any notices and documents related to this project. I can be reached at the address on the letterhead, or terry.davis@sierraclub.org and 916 557-1100 ext. 108.

Sincerely,



Terry Davis
Conservation Program Coordinator