Notice of Preparation
NOTICE OF PREPARATION
CITY OF ROSEVILLE GENERAL PLAN UPDATE
DRAFT ENVIRONMENTAL IMPACT REPORT

Date: August 26, 2019

To: State Clearinghouse, Placer County Clerk-Recorder, Responsible and Trustee Agencies, and other interested Agencies, Parties, and Organizations

Subject: Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the City of Roseville General Plan Update and Notice of Public Scoping Meeting

NOP Comment Period: End of posting period is September 24, 2019 by 5:00 p.m.

Contact Information: City of Roseville Development Services - Planning Division
Gina McColl, Associate Planner
311 Vernon Street
Roseville, CA 95678
Telephone: (916) 774-5452
E-mail: gmccoll@roseville.ca.us

NOTICE IS HEREBY GIVEN THAT the City of Roseville (“the City”) will serve as Lead Agency in the preparation of an environmental impact report (EIR) addressing an update of the City’s 2035 General Plan. This Notice of Preparation (NOP) is being distributed to responsible agencies, trustee agencies, and interested parties, as required by the California Environmental Quality Act (CEQA). The City invites comments on the scope of analysis, feasible mitigation measures for potential impacts of implementation of the General Plan Update, and alternatives that should be explored in the EIR. The City is particularly interested in responses that relate to the statutory responsibilities of responsible and trustee agencies.

NOP Response Period

Due to the time limits mandated by State law, your response to this NOP must be received by the City within 30 calendar days after receipt of this notice, and should be received by 5:00 p.m., September 24, 2019. Please send your response via U.S. Mail or e-mail using the contact information displayed above. Please provide contact information with each response, so that the City may request clarification, if needed. If a responsible or trustee agency fails by the end of this 30-day period to provide a response, the City will presume that the subject responsible or trustee agency does not have a response (CEQA Guidelines Section 15082[b][2]). Responsible and trustee agencies may request a meeting with the City to assist in determining the scope of analysis and other content of the EIR. Please use the contact information above to request such a meeting.
Scoping Meeting

The City will conduct a meeting to (1) inform the public and interested agencies about the General Plan Update; and (2) receive input on the scope of environmental issues to be addressed in the General Plan Update EIR, feasible mitigation for potential impacts, and the range of alternatives that should be evaluated. The date, time, and place of the meeting are as follows:

- **Tuesday, September 17th, 2019**
- **2:00pm-4:00pm (Open House)**
- **Civic Center Meeting Rooms 1 & 2**
- **311 Vernon Street**
- **Roseville, CA 95678**

Those interested in attending the scoping meeting may participate at any time during the 2pm-4pm window – there will be no formal presentation.

Project-Related Documents

Please see the City’s General Plan Update website for more information:

[https://www.roseville.ca.us/government/departments/development_services/planning/projects_of_interest](https://www.roseville.ca.us/government/departments/development_services/planning/projects_of_interest)

(Click on the link to “2018 General Plan Update”)

Project Location

Roseville is in Placer County, 15 miles northeast of downtown Sacramento. The Planning Area for this General Plan Update is the City’s Sphere of Influence. The City’s Sphere of Influence and current City limits are shown in Figure 1.

Background

The General Plan provides the basis for the City’s regulation of the overall amount, character, and location of urban development, as well as preservation and natural resource conservation, economic development, transportation, safety, public facilities and services, and housing. As the City’s “constitution,” the General Plan fulfills State legal requirements for long-range comprehensive planning and provides a framework for the City to exercise its land use entitlement authority, as provided under State law. The General Plan identifies locations within the Planning Area where there is capacity for future growth and identifies how the City will protect, enhance, and maintain a high quality of life along with growth and development.

Because the General Plan includes projections of future development capacity, it serves as a tool for the City and other service providers to plan for services, facilities, infrastructure, and environmental mitigation. The General Plan provides a decision making guide – the City relies on the General Plan when reviewing private development applications, public investments, and other important actions to ensure that they are consistent with the General Plan. The General Plan also provides direction for agencies or organizations that do business or provide services in the City’s Planning Area.
Figure 1  Regional Location
State law requires that a General Plan address seven topics: land use, circulation, housing, conservation, open space, noise, and safety (Government Code Sections 65300 et seq.). These topics can be addressed in individual elements (chapters), or organized and addressed in a different way at the discretion of the jurisdiction. Jurisdictions are also free to adopt additional elements covering subjects of particular interest. The existing General Plan addresses each of the required topics, along with optional elements for air quality and climate change, parks and recreation, and public facilities.

Project Description

The City’s last comprehensive General Plan update was in 1992. The General Plan has been amended with the adoption of specific plans since then, with the most recent update in 2016 with the adoption of the Amoruso Ranch Specific Plan. The Housing Element was certified by the State Department of Community Development in 2013, addressing the Regional Housing Needs Allocation (RHNA) requirements for the planning period of 2013 to 2021. No changes to the Housing Element are proposed as part of this update. This is a focused General Plan Update. The focus is on compliance with State planning laws, the 2017 General Plan Guidelines, and updates to the California Environmental Quality Act (CEQA) Guidelines and precedent case law. The City is not pursuing changes to the Land Use Map or Sphere of Influence as a part of this Update.

In particular, the following revisions are anticipated as a part of this General Plan Update:

- **Circulation Element**: updates to reflect AB 1358 (Complete Streets) and SB 743 as it relates to active transportation and travel demand (vehicle miles traveled, or “VMT”).

- **Air Quality & Climate Change Element**: updates to include feasible mitigation to reduce GHG emissions.

- **Open Space & Conservation Element**: updates to reflect State law related to Native American consultation.

- **Noise Element**: updates for clarity and to better balance the City’s economic development goals with goals for land use and noise compatibility.

- **Throughout entire document**:
  - Revise outdated information, provide greater clarity, and eliminate unnecessary detail that is more appropriate for other City plans and documents.
  - Update goals, policies, and implementation measures consistent with current best practices, State laws, and the General Plan Guidelines.
  - Update the format to be more user friendly.

Probable Environmental Effects

The EIR will evaluate potential environmental impacts associated with adoption and implementation of the General Plan Update. The EIR will disclose potential impacts of the General Plan Update, propose feasible mitigation measures to avoid and/or reduce impacts deemed potentially significant, identify alternatives, and compare the environmental impacts of the alternatives to the impacts of the updated General Plan. The EIR will focus on impacts associated with implementing the updated General Plan compared to baseline conditions, which, in general, are existing physical conditions as of the publication of this NOP. Pursuant to Section 15063(a) of the CEQA Guidelines, no Initial Study will be
prepared. The EIR will evaluate the full range of environmental issues contemplated under CEQA and the CEQA Guidelines, as relevant, and as described below:

► **Aesthetics** – This section will present an analysis of potential impacts to aesthetics, including scenic vistas, scenic resources, and light and glare, as well as a discussion of visual changes that are inconsistent with applicable aesthetic regulations.

► **Agricultural Resources** – This section will present an analysis of potential impacts resulting from the conversion of agricultural land to non-agricultural uses. No property within the Planning Area is zoned as forestland, timberland, or a Timberland Production Zone. The Planning Area does not contain timberland as defined by Public Resources Code Section 4526 or contain 10 percent native tree cover that would be classified as forestland under Public Resources Code Section 12220(g). The EIR will not study Forestry Resources impacts.

► **Air Quality** – Construction and operation of land uses accommodated under the updated General Plan would generate air pollutant emissions. Earth is disturbed during site development activities, generating dust, and construction equipment will create short-term pollutant emissions. Development accommodated under the updated General Plan would result in additional vehicular traffic and demand for energy that would generate air pollution. Land use change under the updated General Plan could expose sensitive receptors to substantial pollutant concentrations and odors.

► **Biological Resources** – This section will address direct and indirect impacts to regulated waterways and wetlands, sensitive habitats and mature native trees, sensitive plants and wildlife, and wildlife movement corridors, and will include a discussion of potential conflicts with relevant biological resources policies or ordinances.

► **Cultural and Tribal Resources** – The EIR will examine potential adverse impacts on historical resources (or eligible historical resources), archaeological, and tribal cultural resources.

► **Energy** – This section will include an analysis of energy consumption attributable to implementation of the General Plan Update, with an emphasis on avoiding or reducing inefficient, wasteful, or unnecessary consumption of energy. The section will also include a discussion of potential conflicts with applicable plans for renewable energy or energy efficiency. Adverse physical environmental effects associated with energy demand within the Planning Area will be reported in relevant sections, such as Air Quality and Greenhouse Gas Emissions.

► **Geology and Soils** – This section will present an analysis of potential direct or indirect geological and seismic impacts from implementation of the General Plan Update, as well as potential effects related to paleontological resources and unique geologic features.

► **Greenhouse Gas Emissions** – The EIR will present an analysis of greenhouse gas emissions attributable to implementation of the General Plan Update and cumulative impacts related to climate change. The EIR will not analyze the impact of climate change or other environmental impacts on the Planning Area, except to the extent the General Plan Update would substantially exacerbate these hazards.

► **Hazards and Hazardous Materials** – This section will discuss impacts related to toxic substances, conflicts with emergency response, and direct or indirect wildfire risk resulting from implementation of the General Plan Update. The City’s Planning Area is not located in safety zones or noise contours associated with airfields or airports that are a concern for land use compatibility planning for this General Plan Update and this issue will not be studied in detail in the EIR.
Hydrology and Water Quality – The EIR will present an analysis of impacts of the General Plan Update related to drainage patterns, erosion, flooding, and water and groundwater quality within the Planning Area.

Land Use and Planning – This section will discuss inconsistencies between the updated General Plan and applicable policies or regulations that were adopted with the express purpose of reducing or avoiding an environmental effect. This section will also examine potential impacts associated with physically dividing an established community.

Mineral Resources – This section will examine impacts to mineral resources of value to the region and residents of the state from implementation of the General Plan Update.

Noise and Vibration – This section will present an analysis of noise generation associated with implementation of the General Plan, as well as vibration impacts. The City’s Planning Area is not located in noise contours associated with airfields or airports that are a concern for land use compatibility planning. This issue will not be studied in detail in the EIR.

Population and Housing – This section will examine adverse physical environmental effects associated with inducing unplanned population growth and displacing substantial numbers of people or housing such that replacement housing would need to be constructed.

Public Services and Recreation – The EIR will present an analysis of increased demand for public services, including police, fire, schools, parks, and recreation to the extent that this increased demand would require service extensions or expansions that could have potentially significant environmental impacts or cause a substantial physical deterioration of existing parks or recreational facilities.

Transportation – The EIR will discuss potential conflicts with applicable policies related to circulation, including transit, roadway, bicycle, and pedestrian facilities and potential conflicts with State guidance related to increases in travel demand. The EIR will also present an analysis of potential impacts related to hazardous design features and emergency access.

Utilities and Service Systems – This section will present an analysis of the potential impacts associated with changes to water supply, wastewater services, solid waste, drainage, electricity, natural gas, and telecommunications systems that would be required to serve demand generated under the General Plan Update.

The EIR will also discuss the cumulative impacts of the project in combination with other closely related past, present, and reasonably foreseeable probable future projects.

The EIR will describe and evaluate the comparative merits of a reasonable range of alternatives to the updated General Plan that would meet the basic project objectives and could avoid or substantially lessen one or more potentially significant impacts. The EIR will also present an analysis of the “no project alternative” and will identify the environmentally superior alternative. The EIR will briefly describe and explain alternatives that were eliminated from detailed consideration. The alternatives to be analyzed will be developed during the environmental review process and will consider input received during the public scoping process.
Notice of Preparation Responses
September 24, 2019

Gina McColl
Associate Planner
City of Roseville Development Services - Planning Division
311 Vernon Street
Roseville, CA 95678

Subject: Notice of Preparation of a Draft Environmental Impact Report
City of Roseville General Plan Update
State Clearinghouse No. 2019080418

Dear Ms. McColl:

The Department of Fish and Wildlife (Department) appreciates the opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the City of Roseville General Plan Update (project) [State Clearinghouse No. 2019080418]. The Department is responding to the NOP as a Trustee Agency for fish and wildlife resources (California Fish and Game Code sections 711.7 and 1802, and the California Environmental Quality Act [CEQA] Guidelines section 15386), and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines section 15381), such as the issuance of a Lake or Streambed Alteration Agreement (California Fish and Game Code sections 1600 et seq.) and/or a California Endangered Species Act (CESA) Permit for Incidental Take of Endangered, Threatened, and/or Candidate species (California Fish and Game Code sections 2080 and 2080.1).

The General Plan update is focused on compliance with State planning laws, the 2017 General Plan Guidelines, and updates to the CEQA Guidelines and case law. The update will include changes to the General Plan’s Circulation Element, Air Quality & Climate Change Element, Open Space & Conservation Element, and Noise Element. The General Plan will also be updated throughout the entire document to revise outdated information, provide greater clarity, remove unnecessary detail, update goals, policies, and implementation measures, and update the format to be more user friendly.

COMMENTS AND RECOMMENDATIONS

The Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of those species (i.e., biological resources); and administers the Natural Community Conservation Planning Program (NCCP Program). The Department offers
the comments and recommendations presented below to assist the City of Roseville (City; the CEQA lead agency) in adequately identifying and/or mitigating the project's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable the Department to adequately review and comment on the proposed project with respect to impacts on biological resources. The Department recommends that the forthcoming DEIR address the following:

Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable Department staff to adequately review and comment on the project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the City's Sphere of Influence, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats. The Department recommends that the DEIR specifically include:

1. An assessment of the various habitat types located within the City's Sphere of Influence, and a map that identifies the location of each habitat type. Adjoining habitat areas should also be included in this assessment where the implementation of the updated General Plan could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.

2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type within the City’s Sphere of Influence and within adjacent areas that could be affected by the project. The Department's California Natural Diversity Database (CNDDB) in Sacramento should be contacted at (916) 322-2493 or bdb@wildlife.ca.gov to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed project.

Please note that the Department's CNDDB is not exhaustive in terms of the data it houses, nor is it an absence database. The Department recommends that it be used as a starting point in gathering information about the potential presence of species within the general area of the City. In order to obtain a more complete list of special status species potentially present, the Department recommends that occurrences in quads adjacent to the City's Sphere of Influence be considered as well as those within.

3. A complete inventory of rare, threatened, endangered, and other sensitive species known to be located within the City's Sphere of Influence and within adjacent areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511).
Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the project area and should not be limited to resident species.

4. A thorough assessment of special status plants and natural communities within the City's Sphere of Influence and within adjacent areas with the potential to be affected.

5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).

Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the project. To ensure that project impacts to biological resources are fully analyzed, the following information should be included in the DEIR:

1. A discussion of potential impacts from lighting, noise, human activity, and wildlife-human interactions created by zoning of development projects or other project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address project-related changes on drainage patterns and water quality within, upstream, and downstream of the project site, including: volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.

2. A discussion of potential indirect project impacts on biological resources, including resources in areas adjacent to the City’s Sphere of Influence, such as nearby public lands (e.g., National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).

3. A cumulative effects analysis developed as described under CEQA Guidelines § 15130. Please include all potential direct and indirect project related impacts to riparian areas, wetlands, vernal pools, aquatic habitats, oak woodlands, wildlife corridors or wildlife movement areas, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
Mitigation Measures for Project Impacts to Biological Resources

The DEIR should include appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of the implementation of the General Plan Update. When proposing measures to avoid, minimize, or mitigate impacts, the Department recommends consideration of the following:

1. **Fully Protected Species:** Fully Protected Species (Fish and Game Code § 3511) may not be taken or possessed at any time. The project should be designed so that its implementation completely avoids any fully protected species that have the potential to be present within or adjacent to the City's Sphere of Influence. The Department also recommends that the DEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. The Department recommends that the City include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce indirect impacts to fully protected species.

2. **Sensitive Plant Communities:** The Department considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2009). The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from project-related direct and indirect impacts.

3. **Mitigation:** The Department considers adverse project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DEIR should include mitigation measures for adverse project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement should be evaluated and discussed in detail. If onsite mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, offsite mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc. Mitigation measures for impacts to burrowing owls or their habitat should be designed in accordance with the Department's 2012 Staff Report on Burrowing Owl
Mitigation (https://nmn.dfg.ca.gov/FileHandler.ashx?DocumentID=83843). Future projects' mitigation strategies should be formulated in advance and included in their CEQA documents rather than deferred until after the results of pre-construction surveys are available.

The proposed Placer County Conservation Program (PCCP) is a landscape-level plan designed to ensure that land will be managed to support the survival and well-being of covered species, as well as hundreds of other species that are dependent on the same habitat. The Department has been working cooperatively for many years with Placer County, City of Lincoln, Placer County Water Agency, United States Fish and Wildlife Service, National Marine Fisheries Service, United States Environmental Protection Agency, United States Corps of Engineers and the State Water Resources Control Board to develop the plan. It is a high priority to the Department. The PCCP recently completed public review and it is anticipated that it will be adopted in the near future. If projects implemented within the City's Sphere of Influence propose biological mitigation within the PCCP area, if any projects are proposed adjacent to the PCCP reserve system, or if any project activities may affect implementation of the PCCP, the Department recommends that the City consider these effects and coordinate with the Placer Conservation Authority to avoid any potential conflicts with the PCCP.

4. Habitat Revegetation/Restoration Plans: Plans for restoration and revegetation should be prepared by persons with expertise in California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

The Department recommends that local onsite propagules from the project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in the near future in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various project components as appropriate.
Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the project; examples could include retention of woody material, logs, snags, rocks, and brush piles.

5. **Nesting Birds and Migratory Bird Treaty Act:** Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 et seq.). In addition, sections 3503, 3503.5, and 3513 of the Fish and Game Code (FGC) also afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by FGC or any regulation made pursuant thereto; section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by FGC or any regulation adopted pursuant thereto; and section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

If the project has the potential to cause impacts to nesting and migratory birds, the Department recommends that the DEIR contain specific measures to avoid those impacts. Project-specific avoidance and minimization measures may include, but not be limited to: project phasing and timing, monitoring of project-related noise (where applicable), sound walls, and buffers, where appropriate. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the project site. If pre-construction surveys are proposed in the DEIR, the Department recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

6. **Moving out of Harm's Way:** If the project is anticipated to result in the clearing of natural habitats that support native species, a qualified biologist may be retained to move out of harm's way wildlife that would otherwise be injured or killed from project-related activities. Movement of wildlife out of harm's way should be limited to only those individuals that would otherwise be injured or killed, and individuals should be moved only as far as necessary to ensure their safety. Please note that temporary relocation of onsite wildlife does not effectively mitigate for project impacts associated with habitat loss.

7. **Translocation of Species:** The Department generally does not support the use of relocation, salvage, and/or transplantation as the sole mitigation for impacts to rare, threatened, or endangered species as studies have shown that these efforts are experimental in nature and largely unsuccessful.
California Endangered Species Act

The Department is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to the California Endangered Species Act (CESA). The Department recommends that a CESA Incidental Take Permit (ITP) be obtained if the project has the potential to result in “take” (California Fish and Game Code section 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) of State-listed CESA species, either through construction or over the life of the project. CESA ITPs are issued to conserve, protect, enhance, and restore State-listed CESA species and their habitats.

The Department encourages early consultation, as significant modification to the proposed project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. Please note that the proposed avoidance, minimization, and mitigation measures must be sufficient for the Department to conclude that the project’s impacts are fully mitigated and the measures, when taken in aggregate, must meet the full mitigation standard.

Lake and Streambed Alteration Program

Fish and Game Code section 1602 requires an entity to notify the Department prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the floodplain of a body of water.

The notification should include maps, preferably using aerial photographs as backgrounds, of all rivers, streams, and lakes in the area of the activity, as well as any riparian habitat, associated wetlands, floodplains, high-flow channels, associated vernal pools, and any other habitats associated with the rivers, streams, and/or lakes. The maps should not be limited to Waters of the United States or the jurisdiction of any other agencies, as river, stream, and lake-associated habitats often extend beyond those limits. Maps of vernal pools should document the hydrologic connectivity, if it exists, to nearby streams and/or to other pools, or any other wetlands. The notification should also include maps showing the proposed activity’s temporary and permanent impacts on the mapped rivers, streams, and/or lakes as well as their associated habitats.

Upon receipt of a complete notification, the Department determines if the proposed project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. A LSA Agreement includes measures necessary to protect existing fish and wildlife resources.
The Department may suggest ways to modify the proposed activity that would eliminate or reduce harmful impacts to fish and wildlife resources.

The Department's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with the Department is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Lake or Streambed Alteration notification package, please go to https://www.wildlife.ca.gov/Conservation/LSA/Notify-CDFW.

Further Coordination

The Department appreciates the opportunity to comment on the NOP of a DEIR for the City of Roseville General Plan Update (SCH No. 2019080418) and recommends that the City address the Department's comments and concerns in the forthcoming DEIR.

If you should have any questions pertaining to the comments provided in this letter or wish to schedule a meeting and/or site visit, please contact Environmental Scientist Gabriele Quillman at (916) 358-2955 or at gabriele.quillman@wildlife.ca.gov.

Sincerely,

Jeff Drongesen
Environmental Program Manager

c: Kelley Barker, Kelley.barker@wildlife.ca.gov
Gabriele Quillman, Gabriele.quillman@wildlife.ca.gov
Department of Fish and Wildlife

State ClearingHouse, state.clearinghouse@opr.ca.gov

Gregg McKenzie, gamcAenzi@placer.ca.gov
Placer County Community Development Resource Agency
Literature Cited


October 24, 2019

Gina McColl – Notice of Preparation of a Draft Environmental Impact Report

Dear Ms. McColl:

Thank you for including California Department of Transportation (Caltrans) in the preliminary review process for the City of Roseville (City) 2035 General Plan update. Caltrans’ new mission, vision, and goals signal a modernization of our approach to California’s transportation system. We review this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision and goals for sustainability/livability/economy, and safety/health. We provide these comments consistent with the state’s mobility goals that support a vibrant economy and build communities.

Vehicle Miles Traveled (VMT) Requirements
Senate Bill 743 (2013) mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all development projects under CEQA, starting July 1, 2020.

As the City begins to update its General Plan, Caltrans anticipates (given the lengthy nature of General Plan analysis and approval processes) that it will reflect a VMT metric and thresholds for land use projects and supports the use of VMT as a metric for transportation projects. Caltrans would like to meet with the City’s traffic engineers to discuss the scope of the traffic study and if the City plans to develop its own thresholds or use those established by the Office of Planning and Research.

For more information see the 2018 CEQA Guidelines update and the Governor’s Office of Planning and Research’s Technical Advisory on Evaluating Transportation Impacts in CEQA dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

If you have questions regarding these comments or require additional information, please contact Shannon Roberts, Intergovernmental Review Coordinator for Placer County, by phone (530) 740-4989 or via email to Shannon.T.Roberts @dot.ca.gov.
Gina McColl  
City of Roseville  
October 24, 2019  
Page 2

Sincerely,

[Signature]

Kevin Yount, Branch Chief  
Office of Transportation Planning  
Regional Planning Branch – East

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
Central Valley Regional Water Quality Control Board

11 September 2019

Gina McColl
City of Roseville
311 Vernon Street
Roseville, CA 95678

CERTIFIED MAIL
7019 0700 0002 0112 0088

COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, CITY OF ROSEVILLE GENERAL PLAN UPDATE PROJECT, SCH#2019080418, PLACER COUNTY

Pursuant to the State Clearinghouse’s 26 August 2019 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the Request for Review for the Notice of Preparation for the Draft Environmental Impact Report for the City of Roseville General Plan Update Project, located in Placer County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

   Basin Plan

   The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State’s water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

   The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental
Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the Water Quality Control Plan for the Sacramento and San Joaquin River Basins, please visit our website: http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

**Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at: https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf

In part it states:

> Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

> This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

**II. Permitting Requirements**

**Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at: http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml
**Phase I and II Municipal Separate Storm Sewer System (MS4) Permits**
The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at: http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

**Industrial Storm Water General Permit**
Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml

**Clean Water Act Section 404 Permit**
If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

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1 Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.
Clean Water Act Section 401 Permit – Water Quality Certification
If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State
If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit
If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver) R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf

**Regulatory Compliance for Commercially Irrigated Agriculture**

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program.

There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board’s website at: https://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/regulatory_information/for_growers/coalition_groups/ or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.

2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 11-100 acres are currently $1,277 + $8.53/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

**Limited Threat General NPDES Permit**

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited*
Threat Discharges to Surface Water (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

NPDES Permit
If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/help/permit/

If you have questions regarding these comments, please contact me at (916) 464-4812 or Jordan.Hensley@waterboards.ca.gov.

Jordan Hensley
Environmental Scientist

cc: State Clearinghouse unit, Governor’s Office of Planning and Research, Sacramento
FYI: 1st response on the NOP

Thank you,

Gina McColl
Associate Planner
Development Services Dept.- Planning Division
o: (916) 774-5452
f: (916) 774-5126
Office Hours: 8:30 am - 4:00 pm M-F
Working together to build a quality community.

Good Morning Gina:

We have reviewed the NOP for the General Plan Update.

We have no comments at this time, however, we would like to review the Circulation Element (SB743 related) information related to thresholds, mitigation, etc. as soon as feasible.

Good luck on the updated.

Thanks,
September 24, 2019

City of Roseville Development Services – Planning Division
Gina McColl, Associate Planner
311 Vernon Street
Roseville, CA  95678

Subject: Notice of Preparation of an EIR for the City of Roseville General Plan Update

Dear Ms. McColl:

Placer County appreciates the opportunity to engage at this stage in the process. After reviewing the submitted information, the County finds that the scope of the issues proposed to be analyzed in the EIR appears adequate. The County does not have any specific comments on the scope of the EIR.

The County looks forward to reviewing the Draft EIR when it is available.

Thank you again for the opportunity to comment on the Notice of Preparation of an EIR for the City of Roseville General Plan Update.

Sincerely,

________________________________________
LEIGH CHAVEZ, PRINCIPAL PLANNER
ENVIRONMENTAL COORDINATOR
Second page info here.
September 10, 2019

Gina McColl
Roseville, City of
311 Vernon Street
Roseville, CA 95678

RE: SCH# 2019080418, City of Roseville General Plan Update Project, Placer County

Dear Ms. McColl:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP) for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, “tribal cultural resources” (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015. If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). Both SB 18 and AB 52 have tribal consultation requirements. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC’s recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.
AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. **Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
   a. A brief description of the project.
   b. The lead agency contact information.
   c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
   d. A “California Native American tribe” is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. **Begin Consultation Within 30 Days of Receiving a Tribe’s Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
   a. For purposes of AB 52, “consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. **Mandatory Topics of Consultation if Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
   a. Alternatives to the project.
   b. Recommended mitigation measures.
   c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. **Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
   a. Type of environmental review necessary.
   b. Significance of the tribal cultural resources.
   c. Significance of the project’s impacts on tribal cultural resources.
   d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. **Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. **Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency’s environmental document shall discuss both of the following:
   a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
   b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).
7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
   a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a
tribal cultural resource; or
   b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be
reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any
mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2
shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and
reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3,
subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead
agency as a result of the consultation process are not included in the environmental document or if there are no
agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if
substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the
lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources
Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse
Impacts to Tribal Cultural Resources:
   a. Avoidance and preservation of the resources in place, including, but not limited to:
      i. Planning and construction to avoid the resources and protect the cultural and natural context.
      ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally
appropriate protection and management criteria.
   b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and
meaning of the resource, including, but not limited to, the following:
      i. Protecting the cultural character and integrity of the resource.
      ii. Protecting the traditional use of the resource.
      iii. Protecting the confidentiality of the resource.
   c. Permanent conservation easements or other interests in real property, with culturally appropriate
management criteria for the purposes of preserving or utilizing the resources or places.
   d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
   e. Please note that a federally recognized California Native American tribe or a non-federally recognized
California Native American tribe that is on the contact list maintained by the NAHC to protect a California
prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation
easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
   f. Please note that it is the policy of the state that Native American remains and associated grave artifacts

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or
Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental
Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted
unless one of the following occurs:
   a. The consultation process between the tribes and the lead agency has occurred as provided in Public
Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code
§21080.3.2.
   b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed
to engage in the consultation process.
   c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code
§21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code
§21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices"
may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf
SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05 Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).

2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.

3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).

4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
   a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
   b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/

**NAHC Recommendations for Cultural Resources Assessments**

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
   a. If part or all of the APE has been previously surveyed for cultural resources.
   b. If any known cultural resources have already been recorded on or adjacent to the APE.
   c. If the probability is low, moderate, or high that cultural resources are located in the APE.
   d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
   a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
   b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project’s APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subs. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov

Sincerely,

Andrew Green
Staff Services Analyst

cc: State Clearinghouse
September 30, 2019

City of Roseville Development Services – Planning Division
Gina McColl, Associate Planner
311 Vernon Street
Roseville, CA 95678

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report for the City of Roseville General Plan Update

Ms. McColl,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the City of Roseville General Plan Update Project (Project) to the Placer County Air Pollution Control District (District) for review and comment. We apologize that this is past the deadline. The comments made are the ones we normally see as part of any general plan updates.

1. The District’s CEQA Thresholds of Significance for criteria pollutants and Greenhouse Gas (GHG) are summarized in the tables below:

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<thead>
<tr>
<th>Criteria Pollutant Thresholds</th>
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<tbody>
<tr>
<td>Construction Phase</td>
</tr>
<tr>
<td>ROG (lbs/day)</td>
</tr>
<tr>
<td>82</td>
</tr>
</tbody>
</table>

The District recommends applying the District’s adopted thresholds to determine the level of significance for the Project’s related criteria pollutants and GHG impacts.

2. The District’s California Environmental Quality Act (CEQA) Air Quality 2017 Handbook (Handbook) provides recommended analytical approaches and feasible mitigation measures when preparing air quality analyses for land use projects. The Handbook is available on the District’s website at http://www.placerair.org/landuseandceqa/ceqaairqualityhandbook. Except where noted below additional detail relating to the following recommended items can be found within the Handbook.

- The Project is located within the Sacramento Valley Air Basin (SVAB) and is under the jurisdiction of the District. The SVAB is designated as nonattainment for federal and state ozone (O3) standards, nonattainment for the federal particulate matter standard (PM2.5) and state particulate matter standard (PM10). Within the Air Quality section of the Initial Study, the District recommends the discussion include the area designations for the federal and state standards for the SVAB.
The California Emissions Estimator Model (CalEEMod) is recommended when estimating the Project related air pollutants emissions from construction and operational phases. CalEEMod quantifies criteria pollutant emissions, including greenhouse gases (GHGs) from construction and operation (including vehicle use), as well as GHG emissions from energy production, solid waste handling, vegetation planting and/or removal, and water conveyance. In addition, CalEEMod calculates the benefits from implementing mitigation measures, including GHG mitigation measures, developed and approved by CAPCOA. Please contact the District for information on appropriate default settings applicable to the project area.

The District requests copies of all modeling analysis files during the review of the DEIR for public review and comment.

In the event the air quality analysis demonstrates the potential for the Project to cause or generate significant adverse air quality related impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. Additional mitigation measures can be found in the District’s CEQA Handbook within the following related appendices.

Appendix A. District Rules and Regulations (Construction and Operational)
Appendix C. Recommended Mitigation Measures (Construction)
Appendix E. Recommended Mitigation Measures (Operational)
Appendix F. Mitigation Measures (Greenhouse Gases)

As previously stated, the Project is located within the SVAB and is designated nonattainment for the PM$_{2.5}$ standard. PM has been linked to a range of serious respiratory and cardiovascular health problems. Wood burning devices are a source of PM emissions which contribute to the region’s air pollution. The District recommends that the construction, installation or use of wood burning devices be prohibited within the Project area. Only natural gas or propane fired fireplace appliances shall be allowed. These appliances shall be clearly delineated on the Floor Plans submitted in conjunction with the Building Permit application.

The District recommends a CALINE 4 modeling analysis for carbon monoxide (CO) concentration be performed and discussed within the environmental document either of the following scenarios is true for any intersection affected by the project traffic, the project should conduct a site-specific CO dispersion modeling analysis to evaluate the potential local CO emission impact at roadway intersections:

- A traffic study for the project indicates that the peak-hour LOS on one or more streets or at one or more intersections (both signalized and non-signalized) in the project vicinity will be degraded from an acceptable LOS (e.g., A, B, C, or D) to an unacceptable LOS (e.g., E or F); or
- A traffic study indicates that the project will substantially worsen an already existing unacceptable peak-hour LOS on one or more streets or at one or more intersections in the project vicinity. “Substantially worsen” includes situations where a delay would increase by 10 seconds or more when project-generated traffic is included.

Thank you for allowing the District this opportunity to review the project proposal. Please do not hesitate to contact me at 530.745.2327 or ahobbs@placer.ca.gov if you have any questions.

Sincerely,

Ann Hobbs
Associate Planner
Planning & Monitoring Section

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1 http://www.epa.gov/ncer/science/pm/
Notice of Preparation of a Draft Environmental Impact Report for the City of Roseville General Plan Update
September 24, 2019

Gina McColl, Associate Planner  
City of Roseville Development Services – Planning Division  
311 Vernon Street  
Roseville, CA 95678

Subject: Comments on Notice of Preparation of Draft Environmental Impact Report (DEIR) for City of Roseville General Plan Update

Dear Ms. McColl:

Reclamation District No. 1000 (RD 1000; District) appreciates the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the City of Roseville General Plan Update (Plan). RD 1000 is the entity responsible for the operation and maintenance of the levees and drainage system protecting the Natomas Basin in Sacramento and Sutter counties. Minimizing the impacts of flooding for human safety, health, and welfare is RD 1000’s sole mission. As such, the District has been working closely with the Sacramento Area Flood Control Agency (SAFCA), State Central Valley Flood Protection Board and U.S. Army Corps of Engineers (USACE) on levee improvements to provide a minimum of 200-year flood protection to the system commensurate with the flood risk, as required by State Urban Level of Flood Protection standards.

Due to the nature of the items to be considered in the Plan coupled with RD 1000’s mission to minimize impacts of flooding, the District requests the DEIR specifically address the following comments:

**Hydraulic Impact Analysis.**

- The hydraulic impact analysis should evaluate changes to peak stage for the 10 – 200-year flood events, as required by the State’s Urban Level of Flood Protection (ULOP).

- The evaluation of hydraulic impacts should focus on mitigating increases in peak flood stage, as well as changes in the duration of flooding and changes in velocity that have the potential to increase erosion. This is particularly true for downstream levee systems that have a short hydrograph. Extending the duration of high water on these levee systems may result in increased performance issues associated with seepage both through and under the levees. The District requests that the DEIR disclose the change in duration of flood events and determine whether that change adversely effects downstream levee systems. Mitigation measures could be considered that include alternatives such as groundwater recharge, metering the water more slowly out of detention basins, or storage of the water for use.
• RD 1000 is concerned the potential impacts of increased storm water drainage flows into upstream tributaries for past projects; and potential future projects may increase flood risks downstream. Mitigating increased runoff is crucial in order to avoid downstream impacts to critical flood infrastructure. Mitigation measures in the DEIR should consider all potential hydrologic impacts; specifically, increases to peak and base flows, the duration of runoff, duration of peak flows, and the subsequent increased periods of high velocities.

• Hydrographs for smaller systems tend to have shorter hydrographs. Past performance is based on this tendency and is considered in the design of downstream levee improvements. If detention is the alternative used to mitigate increases in peak flow, it can result in the adverse impact of extending the duration of the hydrograph. This has the potential to increase geotechnical problems, such as slope stability and under seepage, and can contribute to an increase of erosion potential, all of which would increase flood risk and create increased Operations and Maintenance (O&M) costs for downstream critical flood infrastructure. In addition, to peak flows and duration, upstream development typically results in higher base flows due to runoff from landscaping, wastewater treatment discharge, or other discharges associated with urbanization. Increasing base flows may also result in increased vegetation growth, erosion, and beaver activity; thus, causing an increase in downstream O&M costs.

Any of the impacts discussed in this letter could have detrimental downstream effects that not only could increase flood risk to public safety but could also result in increased O&M costs for RD 1000 that may be required in order to mitigate potential Plan impacts. Flood risk may include erosion, increased vegetation, or potential impacts to channel maintenance or downstream flood infrastructure due to an increased duration of peak runoff and peak flows.

Therefore, RD 1000 believes thorough hydraulic impact analysis is a critical component of the DEIR. The Plan should consider any planned future development within the area that may contribute to cumulative downstream effects on both stage and duration of peak flows.

The District appreciates the opportunity to review and comment on Notice of Preparation for the DEIR for the General Plan Update. The District is prepared to work with the City of Roseville to ensure the Plan impacts are appropriately addressed and mitigated. Should there be further questions or the need for additional clarification on the information provided, please contact me directly via email (kking@rd1000.org) or phone (916) 922-1449.

Sincerely,

Reclamation District 1000

Kevin L. King
General Manager
August 26, 2019

To: Reviewing Agencies
Re: City of Roseville General Plan Update
SCH# 2019080418

Attached for your review and comment is the Notice of Preparation (NOP) for the City of Roseville General Plan Update draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Gina McColl
Roseville, City of
311 Vernon Street
Roseville, CA 95678

with a copy to the State Clearinghouse in the Office of Planning and Research at state.clearinghouse@opr.ca.gov. Please refer to the SCH number noted above in all correspondence concerning this project on our website: https://ceqanet.opr.ca.gov/2019080418/2.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

[signature]
Scott Morgan
Director, State Clearinghouse

cc: Lead Agency
County: Placer

Native American Heritage Comm.
Debbie Treadway

Public Utilities Commission
Supervisor

Santa Monica Bay Restoration
Guangyu Wang

State Lands Commission
Jennifer Deleong

Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Cal State Transportation Agency CalSTA

Caltrans - Division of Aeronautics
Philip Crimmins

Caltrans - Planning
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Caltrans, District 7
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Caltrans, District 8
Mark Roberts

Caltrans, District 9
Gayle Rosander

Caltrans, District 10
Tom Dumas

Caltrans, District 11
Jacob Armstrong

Caltrans, District 12
Maureen El Harake

Regional Water Quality Control Board (RWQCB)

RWQCB 1
Cathleen Hudson
North Coast Region (1)

RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)

RWQCB 3
Central Coast Region (3)

RWQCB 4
Teresa Rodgers
Los Angeles Region (4)

RWQCB 5S
Central Valley Region (5)

RWQCB 5F
Central Valley Region (5)
Fresno Branch Office

RWQCB 5R
Central Valley Region (5)
Redding Branch Office

RWQCB 6
Lahontan Region (6)

RWQCB 6V
Lahontan Region (6)
Victorville Branch Office

RWQCB 7
Colorado River Basin Region (7)

RWQCB 8
Santa Ana Region (8)

RWQCB 9
San Diego Region (9)

Other

Conservancy

Last Updated 5/22/18