

10 REVISIONS TO THE DRAFT EIR

This section contains changes to the text of the Draft General Plan Update EIR. The changes are presented in the order in which they appear and are identified by page number. Text deletions are shown in strikethrough (~~strikethrough~~) and additions are shown in underline (underline).

10.1 CHAPTER 2, “PROJECT DESCRIPTION”

10.1.1 TABLE 2-1, PAGE 2-20

Table 2-1 was provided in the Draft General Plan Update EIR as a detailed summary of revisions to goals and policies proposed as a part of the General Plan Update. Minor revisions are proposed to Policies OS4.6 and OS4.10 and a new policy – Policy OS4.12 – is proposed to address continued coordination with Native American Tribal representatives.

Policy OS4.6 [Policy 5]: The preservation of buildings and other resources that have historical or architectural value should be ~~preserved, whenever feasible~~ considered, and the City will ~~encourage~~ support willing private property owners to in the preservation, maintenance, and/or renovation of significant historic resources, consistent with applicable Department of the Interior historic preservation standards.

Policy OS4.10 [Policy 9]: Provide opportunities for public awareness and education through coordination with the Roseville Historical Society ~~and~~ local schools, and culturally affiliated California Native American tribes.

Policy OS4.12: The City will continue to coordinate with Native American Tribes that are traditionally and culturally affiliated with resources in the Planning Area on management of, and access to City properties that have Tribal Cultural Resources.

10.2 SECTION 4.3, “TRANSPORTATION”

10.2.1 EXHIBIT 4.3-4, “GENERAL PLAN NUMBER OF TRAVEL LANES”, PAGE 4.3-25

This exhibit has been corrected to show the correct number of travel lanes.

10.2.2 EXHIBIT 4.3-5, “GENERAL PLAN LANE INCREASES”, PAGE 4.3-27

This exhibit has been corrected to show the correct increase in the number of travel lanes.

10.2.3 TABLE 4.3-5, PAGE 4.3-31

The following minor revisions have been made to the number of employees, the local service population, and the existing vehicle miles traveled (VMT) per service population.

Table 4.3-5 City of Roseville VMT Thresholds Analysis		
	Service Population Methodology	Per Capita Methodology
VMT Produced	5,459,700	1,822,100
# of Residents	120,812	120,812
# of Employees	69,026 <u>67,530</u>	--
Service Population	189,838 <u>188,342</u>	--
Baseline VMT Metric	28.8 <u>29</u> VMT/service population	15.1 VMT/capita
Target VMT Metric	24.5 VMT/service population	12.8 VMT/capita
Note: The City's threshold is 12.8 VMT/capita. Service sector thresholds are included for informational purposes.		

10.2.4 PAGE 4.3-31

The following minor clarification is made in the second paragraph following Table 4.3-5, partly in response to a comment from the Placer County Air Pollution Control District (PCAPCD) on the Draft General Plan Update EIR.

Quantitative analysis would not be required if it can be demonstrated that a project is consistent with the General Plan and would generate VMT which is equivalent to or less than what was assumed in this General Plan EIR. Examples of such projects include local-serving retail and other local-serving development, which generally reduces existing trip distances by providing services in closer proximity to residential areas, and therefore reduce VMT. Multi-family residences generally have fewer trips per household than single-family residences, and therefore also produce less VMT per unit. Infill projects in developed areas generally have shorter trips, reduced vehicle trips, and therefore less VMT (low VMT areas, as described in the analysis below). Pedestrian, bicycle, transit, and electric vehicle transportation projects are presumed to be consistent with the VMT analysis, while new vehicular transportation projects not included in this General Plan that could induce additional VMT would be presumed to have a conflict and would require quantitative analysis. Residential projects in low per-capita household VMT areas and office projects in low per-worker VMT areas (85 percent or less than the regional average) as shown on maps maintained by SACOG would also be presumed not to have a significant effect.

10.2.5 PAGES 4.3-33 AND 4.3-34, IMPACT 4.3-1

The following minor revisions have been made to the VMT impact analysis based on updated analysis using the correct number of travel lanes.

IMPACT 4.3-1 **VMT Per Capita Exceeds the Threshold of 12.8 VMT Per Capita.** *The VMT generated by buildout of the existing General Plan is 15.45 VMT per capita under financially constrained network conditions and 14.9 VMT per capita under financially unconstrained network conditions. This exceeds the significance threshold. This impact is considered **significant**.*

Table 4.3-~~5~~6 presents the total VMT and total VMT per service population for the City of Roseville for trips beginning or ending in the City. As shown, total VMT is expected to increase by about ~~88~~ 89 percent over baseline conditions across all scenarios. This generally matches the

growth assumptions of 56 percent more residential, 81 percent more office, and twice as much retail, industrial, and high-tech industrial.

Table 4.3-56 Total Vehicle Miles Traveled by City of Roseville Land Uses: Service Population Analysis			
Measure	Baseline	General Plan Buildout (Constrained)	General Plan Buildout (Unconstrained)
Total VMT	5,459,700	10,307,809-289,700	10,125,800
Residents	120,812	188,968	188,968
Employees	69,026 67,530	123,177-050	123,177-050
Service Population	189,838 188,342	312,145 018	312,145 018
Total VMT/ Service Population	29 28.8	33.0	32.45

Note: Includes full length of all trips with either an origin or destination with the City of Roseville limits.
Source: Fehr & Peers 2020

This table indicates that VMT per service population increases under all 2035 scenarios when compared to baseline conditions. This is caused by two factors. First, as is demonstrated in more detail later, the majority of the residential growth is predicted to occur on the edges of the Planning Area, further away from goods and services than most existing residences. Hence, trip lengths increase for these residents. Second, the percentage of the service population consisting of employees increases from 36 percent under baseline conditions to 39 percent under 2035 conditions. This is important because the incremental addition (using the service population methodology) of one added resident adds about 3.2 daily trips; in contrast, one added office employee adds about 4.4 trips and one added retail employee generates about 12 trips (added trips include trips by the resident/employee, as well as customers and others utilizing the development).¹ When daily trips are then converted into VMT by multiplying by the trip length, the same trend occurs.

Table 4.3-76 presents the home-based production VMT and home-based production VMT per resident for the City of Roseville for trips beginning or ending in the City, also known as a per capita VMT analysis. This table indicates that the two constrained scenarios would exhibit per capita VMT that is ~~two~~ 2.6 percent above baseline conditions. The unconstrained proposed project scenario would have per capita VMT that is 1.3 percent below baseline conditions. In all likelihood, the constrained scenario is enabling motorists to travel more directly to their destinations (versus seeking less direct, but quicker routes) due to less traffic intrusion from freeways. Although the project results in slightly less VMT per capita than existing conditions, it remains above the significance threshold of 12.8 VMT per capita.

¹ Calculated as follows:

- Residential: 8.6 daily trips per unit / 2.7 persons per unit = 3.2 trips per person (based on blended average of single-family and multi-family residential trip rates and average HH size)
- Office: 17 daily trips per ksf / 4 employees per ksf = 4.4 trips per employee (City of Roseville model trip rate)
- Retail: 35 daily trips per ksf / 3 employees per ksf = 12 trips per employee (City of Roseville model trip rate).

Measure	Baseline	General Plan Buildout (Constrained)	General Plan Buildout (Unconstrained)
Home-Based Production VMT	1,822,100	2,920,117 2,911,300	2,810,400
Residents	120,812	188,968	188,968
Home-Based Production VMT/ Resident	15.1	15.5 15.4	14.9

Source: Fehr & Peers 2020

A comparison of VMT in Specific Plan Areas is shown in Table 4.3-8. Most residential development will happen in the Amoruso Ranch, Creekview, Sierra Vista, and West Roseville Specific Plan Areas under buildout of the General Plan. These areas, farther away from the core of the city, all have home-based production VMT per resident that is greater than the citywide value. Low-VMT areas—locations which generate VMT at or below the significance threshold—are shaded on the table. Future projects in these areas consistent with the proposed General Plan would generally be assumed not to have significant VMT impacts.

Specific Plan Area	Total VMT	Home-Based Production VMT	Residents	Home-Based Production VMT / Resident
City of Roseville	10,307,809 10,289,735	2,920,117 2,911,262	188,968	15.5 15.4
Amoruso Ranch	284,513 283,015	164,598 163,065	7,756	21.2 21.0
Creekview	154,848 154,398	101,432 100,956	5,193	19.5 19.4
Del Webb	107,622 107,243	43,331 43,160	4,824	9.0 8.9
Downtown	259,171 259,312	27,259 27,230	2,386	11.4
Highland Reserve North	435,194 434,424	57,759 57,590	4,333	13.3
Infill	2,237,136 2,237,816	592,656 592,717	42,652	13.9
North Central Roseville	1,670,095 1,666,463	131,321 131,171	11,400	11.5
North Industrial	1,391,490 1,281,982	78,225	5,086	15.4
North Roseville	431,281 428,255	231,733 230,117	13,844	16.7 16.6
Northeast Roseville	1,426,283 1,428,255	43,992 43,928	3,804	11.6 11.5
Northwest Roseville	632,636 628,895	346,294 345,484	23,414	14.8
Riverside Gateway	66,345 66,383	3,482 3,478	290	12.0
Sierra Vista	933,049 932,236	412,716 412,300	22,345	18.5
Southeast Roseville	466,167 466,701	101,843 101,830	7,709	13.2
Stoneridge	236,157 235,630	102,102 101,556	7,104	14.4 14.3
West Roseville	814,158 811,396	2,920,117 2,479,721	26,828	17.9

Note: The summation of VMT for all specific plan areas is greater than for the city as a whole because VMT associated with a trip from one specific plan to another is counted separately for each specific plan, but only once for the city as a whole.

Source: Fehr & Peers 2020

10.2.6 IMPACT 4.3-2, PAGE 4.3-39

The following minor revisions have been made to the VMT impact analysis based on updated analysis using corrections to the number of travel lanes and to add a footnote clarifying that traffic congestion is not an impact under CEQA.

IMPACT² 4.3-2 **Roadway System Level of Service (Informational Analysis).** *Transportation network changes under the proposed General Plan Update and land use change under buildout of the General Plan would not conflict with the City's policy of at least 70 percent of signalized intersections achieving LOS C or better during the a.m. and p.m. peak hours.*

LOS was analyzed for signalized intersections to determine if the proposed General Plan Update would conflict with the City's policy of at least 70 percent of signalized intersections operating at LOS C or better during the a.m. and p.m. peak hours (tier one analysis). Table 4.3-9~~8~~ presents these results. As shown, at least 70 percent of intersections would perform at LOS C or better in all scenarios.

Level of Service	A.M. Peak Hour	P.M. Peak Hour
Baseline	87.3 percent	77.2 percent
Proposed General Plan Constrained	83.5 9 percent	71.9 percent
Proposed General Plan Unconstrained	83.9 percent	72.3 8 percent

Note: In Pedestrian Overlay Districts, the City prioritizes other modes of transportation, and the LOS C standard does not apply.
Source: Fehr & Peers 2020

10.3 SECTION 4.4, "AIR QUALITY"

10.3.1 TABLE 4.4-2, PAGE 4.4-8

Table 4.4-2 has been updated to reflect Placer County attainment of the Federal 1-hour ozone standard and the State PM_{2.5} standard.

² Future conditions related to traffic congestion are generally not considered an impact under CEQA, but are reported in this EIR in detail for informational purposes.

Table 4.4-2 Attainment Designations for the Placer County Portion of the Sacramento Valley Air Basin		
Pollutant	Federal Standard	California Standard
Ozone ^a	Nonattainment (1-hour) ^a	Nonattainment (1-hour) ^b
	Nonattainment (8-hour) ^c	Nonattainment (8-hour)
Particulate Matter— 10 Micrometers or Less	Attainment (24-hour)	Nonattainment (24-hour)
		Nonattainment (annual)
Particulate Matter— 2.5 Micrometers or Less	Nonattainment (24-hour)	Nonattainment (annual)
	Attainment (annual)	
Carbon Monoxide	Attainment (1-hour)	Attainment (1-hour)
	Attainment (8-hour)	Attainment (8-hour)
Nitrogen Dioxide	Unclassified (1-hour)	Attainment (1-hour)
	Attainment (annual)	Attainment (annual)
Sulfur Dioxide	Attainment/Unclassifiable (1-hour)	Attainment (1-hour)
	Attainment/Unclassifiable (24-hour)	Attainment (24-hour)
	Attainment/Unclassifiable (annual)	–
Lead	Attainment (3-month rolling average)	Attainment (30-day average)
Hydrogen Sulfide	No Federal Standard	Unclassified (1-hour)
Sulfates		Attainment (24-hour)
Visibility-Reducing Particles		Unclassified (8-hour)
Notes:		
^a Air quality meets the federal 1-hour ozone standard (77 <i>Federal Register</i> 64036, October 18, 2012). The U.S. Environmental Protection Agency (EPA) revoked this standard, but some associated requirements still apply. The Sacramento Federal Nonattainment Area attained the standard in 2009, and has SMAQMD has , on behalf of the counties within the Sacramento Federal Nonattainment Area, requested that EPA recognize attainment to fulfill the requirements.		
^b Per Health and Safety Code Section 40921.5(c), the classification is based on 1989–1991 data, and therefore does not change.		
^c 2008 standard.		
Source: ARB 2018		

10.3.2 PAGE 4.4-28

Text has been revised to clarify that Placer County Air Pollution Control District (PCAPCD) Rule 228 applies regardless of the size of future construction projects.

Conclusion

As discussed in the analysis above, the project will generate emissions that exceed PCAPCD significance thresholds. Existing laws and regulations, including PCAPCD rules and regulations, combined with existing General Plan and proposed General Plan Update policies, would reduce these impacts. In particular, projects within the Planning Area ~~greater than one acre in size~~ would be subject to PCAPCD Rule 228 to minimize fugitive dust emissions of PM through implementation of dust control measures, such as PCAPCD’s standard Dust Control Requirements; ~~projects smaller than this are considered by the Air District to emit de minimis levels of dust.~~ PCAPCD Rules 202 and 205 would also reduce exhaust-related emissions from the

use of construction equipment. PCAPCD Rules 217 and 218 would reduce VOC emissions associated with paving and architectural coating activities.

10.3.3 TABLE 4.4-5, PAGE 4.4-29

Very minor revisions have been made to the operational air pollutant emissions estimates.

Table 4.4-5 Summary of Maximum Daily Operational Emissions of Criteria Air Pollutants and Precursors: Full Buildout of the proposed General Plan Update (2035)			
Construction Phase	Maximum Daily Emissions (lb/dy)		
	ROG	NO_x	PM₁₀
Area	38,745	748	6,437
Energy	26	227	18
Mobile ¹	161	1,701,643	3,609,487
Total Daily Operational Emissions²	38,937	2,676,618	10,069,942
PCAPCD Thresholds of Significance	55	55	82
Does Project Exceed Thresholds?	Yes	Yes	Yes
Notes: lb/day = pounds per day; VOC = volatile organic compounds; NO _x = oxides of nitrogen; PM ₁₀ = respirable particulate matter with an aerodynamic diameter of 10 micrometers or less; PCAPCD = Placer County Air Pollution Control District. 1. Mobile emissions are calculated outside of CalEEMod using EMFAC 2017 emissions rates and VMT from the Transportation Impact Analysis. 2. Total emissions may not add correctly due to rounding. Source: AECOM 2019; See Appendix B for detailed modeling assumptions, outputs, and results.			

10.3.4 PAGE 4.4-51

The discussion related to odors has been revised to include more up-to-date information.

The WRS� and MRF have had a history of odor complaints. In 2013, the PCAPCD received three complaints for odor. The complaints came from the Crocker Ranch, Whitney Ranch, and West Park residential developments all located south of the WRS� (City of Roseville 2016). In February 2015, the WRS� registered over 200 plus odor complaints. The PCAPCD monitors the WRS� odor complaints and, in February 2015, it issued the WRS� a notice of violation (NOV). Since the NOV was issued, PCAPCD receives real-time data from the WRS� regarding odor complaints made on the WRS� website (City of Roseville 2016). The Western Placer Waste Management Authority, the public agency who is responsible for the WRS� and MRF operation, developed an on-line order notification for the public to report odor issues. Notifications received by the Western Placer Waste Management Authority are directly forwarded to the PCAPCD and the PCAPCD works closely with the Western Placer Waste Management Authority to review where the complaints are characterized by odor smells, from trash smelling to other more detailed descriptions. According to PCAPCD, in 2019⁵, after the issuance of the NOV, the PCAPCD received four direct complaints and 179 notifications forwarded from the Western Placer Waste Management Authority. WRS� registered less than 30 odor complaints (City of Roseville

~~2016~~PCAPCD 2020). Residential land uses are south of these facilities, along the norther border of the Planning Area. Given the complaint history of the facilities, it is likely that sensitive receptors would experience occasional odors from landfill and MRF operations.

The PGWWTP is in the western portion of the Planning Area, and is currently surrounded by open space with existing low-density residential development approximately 0.2 miles to the west, 0.3 miles to the south, and 0.5 miles to the west. The prevailing wind direction is south to north, but winds from north to south occur more often in the winter months. Proposed residential uses approximately 0.5 miles to the north would have the highest likelihood of exposure to intermittent odors from the PGWWTP. However, wastewater processing at PGWWTP incorporates odor control techniques, such as oxygenating the wastewater holding ditches so that non-anaerobic bacteria cannot produce gases. According to PCAPCD, since 2019, PCAPCD has received 3 complaints and 62 forwarded notifications with respect to the PGWWTP. ~~Considering the odor controlling processes at PGWWTP, while the PGWWTP may occasionally emit odors that could be observed by residents within a half mile, it is unlikely that a substantial number of people would experience frequent odors as a result of the PGWWTP.~~

10.4 SECTION 4.5, “GREENHOUSE GAS EMISSIONS”

10.4.1 TABLE 4.5-3, PAGE 4.5-18

Table 4.5-3 has been revised so that the title of the table provides better clarity on the table’s contents. The employment estimates for each year have also been updated. The emissions per service calculation are accurate and require no update.

	2020	2030	2035	2050
Emissions Targets (MT CO ₂ e/yr) ¹	293,400,000	176,040,000	146,700,000	58,680,000
Percent Mass Emissions Reduction	n/a	40% below 2020	50% below 2020	80% below 2020
Population ²	40,719,999	44,019,846	45,521,334	49,158,401
Employment	17,178,680 18,686,300 ³	<u>19,010,119</u> 20,634,693 ⁴	<u>19,658,541</u> 21,338,529 ⁴	<u>21,229,221</u> 23,043,437 ⁴
Service Population (SP)	57,898,579	63,029,965	65,179,875	70,387,622
Per Capita Emissions Efficiency Targets (MT CO ₂ e/capita/yr)	7.21	4.00	3.22	1.19
Per Service Population Emissions Efficiency Targets (MT CO ₂ e/SP/yr)	5.07	2.79	2.25	0.83

Table 4.5-3 City of Roseville Efficiency Thresholds Based on Statewide Demographics Adjusted for Relevant Land Uses*				
	2020	2030	2035	2050
<p>*Future projects which use these thresholds for environmental analysis should include a brief justification of the type of efficiency target and the target year selected. Per capita is most applicable to projects which only include residential uses, or in cases where reliable data to generate a service population estimate is unavailable. Projects should generally use the 2035 target year. Note that future projects consistent with the General Plan will not require further analysis, per the tiering provisions of CEQA.</p> <p>Note: MMT CO₂e = million metric tons of carbon dioxide equivalent; Service Population (SP) = population + employment</p> <p>¹ California 1990 Greenhouse Gas Emissions Level and 2020 Limit by Sector, ARB: <http://www.arb.ca.gov/cc/inventory/1990level/1990level.htm>; targets for future years based upon percent mass emissions reduction targets established by SB 32 and EO-S-3-05, and an interpolation between 2030 and 2050 targets for the year 2035, in alignment with state reduction targets presented in Table 4.5-1.</p> <p>² Department of Finance (DOF) Table P-1 Total Estimated and Projected Population for California and Counties: July 1, 2010 to July 1, 2060 in 5-year increments. February 2017. Available online at: <http://www.dof.ca.gov/Forecasting/Demographics/projections/></p> <p>³ Interpolated from revised (i.e., land-use related) Employee Development Department (EDD) Employment Projections for 2014 (15,694,600) and 2024 (18,167,900). Available online at: <http://www.labormarketinfo.edd.ca.gov/data/employment-projections.html>. Sorted to remove jobs from: 11-9013 Farmers, Ranchers, and Other Agricultural Managers; 19-1032 Foresters; 19-4041 Geological and Petroleum Technicians; 19-4093 Forest and Conservation Technicians; 45-000 Farming, Fishing, and Forestry Occupations; 47-5000 Extraction Workers; 49-3011 Aircraft Mechanics and Service Technicians; 49-3041 Farm Equipment Mechanics and Service Technicians; 49-9041 Industrial Machinery Mechanics; 49-9043 Maintenance Workers, Machinery; 49-9044 Millwrights; 51-0000 Production Occupations; 53-2000 Air Transportation Workers; 53-4000 Rail Transportation Workers; and 53-5000 Water Transportation Workers.</p> <p>⁴ EDD does not provide employment estimates to 2050, so the ratio of employment to population estimated in 2024 (i.e., 43.2%) was applied to the DOF population estimates for 2030, 2035, and 2050 to estimate employment in those years. See Appendix B for detailed calculations and data inputs.</p>				

10.4.2 IMPACT 4.5-1, PAGE 4.5-20

The text has been revised to clarify the analysis scenarios that are detailed in this section and very minor revisions have been made to Table 4.5-5 to reflect updated estimates.

Long-term operational emissions would be generated by the day-to-day activities associated with existing and proposed land uses within the Planning Area. Operational GHG emission sources would include energy consumption (i.e., electricity and natural gas), transportation, waste, and water and wastewater. Operational GHG emissions are distinguished by direct and indirect GHG emissions. Direct GHG emissions are generated at the location of consumption or use. For example, mobile-source emissions are direct because GHG emissions are generated as a vehicle begins to move. Indirect emissions occur at a different time or location from the point of consumption or use. For example, electricity-related GHG emissions are indirect because although a consumer uses electricity at their home, the fuel combustion and emissions associated with creating that electricity likely occurred off-site or at a different time. Table 4.5-75 presents the operational GHG emissions estimates for existing land uses and activity within the Planning Area, ~~proposed new land uses~~, and total operations for the Planning Area with full buildout of under the proposed General Plan Update. Existing operational emissions are based on data from the transportation modeling prepared for the proposed General Plan Update, as well as activity data for local emission source operations provided by the City and relevant agencies for each

sector. Operational emissions for buildout of the proposed General Plan Update are provided for the year 2035, consistent with the cumulative horizon year for the General Plan, and are based upon land use categories and emissions modeling using CalEEMod. Amortized construction-related emissions are then added to the total operational emissions of the Planning Area anticipated with full buildout of the General Plan in 2035, and these emissions are compared the GHG efficiency threshold for 2035 (see Table 4.5-3).

Table 4.5-5 Modeled GHG Emissions Generated within the Planning Area (emissions are presented in MT CO₂e unless otherwise stated)		
	Existing Conditions¹	Total Planning Area (Existing + New Development)
Operational Source		
Area ²	Not Available	115,302
Energy ³⁺	446,557	303,238
Mobile ⁴⁺	565,734	1,071,198 204
Waste	33,236	87,758
Water	4,903	33,268
Total Annual Operational Emissions	1,050,430	1,610,7637
Total Annual Operational (2035) + Amortized Construction Emissions	-	1,629,03740
Existing Service Population (residents + employees)	204,802	318,252
Total⁵⁺ Annual Project Emissions (MT CO₂e) per Service Population³	5.13	5.12
<i>GHG Efficiency Threshold (MT CO₂e per service population)</i>	-	2.25
Exceed threshold?	-	Yes
Notes:		
¹ 2016 emissions inventory is based on City and relevant agency provided activity data, use of industry standard emission factors, and modeling results from the ClearPath tool, which allow users to input the sector activity (e.g., kilowatt hour) and emission factors to calculate the final carbon dioxide equivalent (CO ₂ e) emissions. See Appendix B for additional detail.		
² Area emissions would be those generated by wood burning fireplaces. Data was not available to assess these emissions for 2016 conditions. Default modeling assumptions were used for the purposes of the Total GP Planning Area Full Buildout Scenario.		
³ Energy emissions are calculated based upon Roseville Electric Utility emissions factor for year 2016, and projected Roseville Electric Utility emission factor for 2035 based upon increased Renewable Portfolio Standard (RPS) percentage within the power mix.		
⁴ Mobile emissions are calculated using EMFAC 2014 emissions rates for the existing conditions scenario and EMFAC 2017 emissions rates and VMT from the Transportation Impact Analysis for the Total GP Planning Area Full Buildout Scenario.		
⁵⁺ Annual project emissions (amortized construction + operational) per service population are calculated based upon estimate of 198,000 residents + 120,000 employees in the City of Roseville in 2035 with buildout of the proposed General Plan Update (See General Plan Land Use Element)		
Totals do not add due to rounding.		
Source: Modeled by AECOM in 2019		

10.5 SECTION 4.9, “CULTURAL AND TRIBAL CULTURAL RESOURCES”

10.5.1 INTRODUCTION, PAGE 4.9-1

Text has been added to clarify the relationship between cultural resources and tribal cultural resources.

This chapter describes potential impacts related to cultural and tribal resources in the Planning Area associated with the proposed General Plan Update, including archaeological resources and human remains. Although the cultural and tribal cultural resources impact topics have areas of overlap and have been combined in order to avoid duplication and reduce page-length of the EIR, it is important to understand that these are different types of resources. To provide context for the impact analysis, this chapter begins with an environmental setting describing the cultural context for the prehistoric, ethnographic, and historic-era background of the Planning Area. Next, the regulatory framework is described, which informs the selection of the significance thresholds used in the impact analysis, including the separate thresholds used for cultural resources and tribal cultural resources. The regulatory framework also includes existing General Plan policies related to the impact analysis of this chapter. The chapter concludes with the applicable significance thresholds, the impacts of the proposed changes to adopted General Plan policies, recommended mitigation measures, and the significance conclusions.

As part of the impact analysis, Notice of Preparation (NOP) comments were reviewed to help guide the analysis, and any comments were integrated into the analysis. One response was received from the Native American Heritage Commission (NAHC) summarizing the existing requirements contained in Assembly Bill (AB) 52, Senate Bill (SB) 18, and suggestions for early tribal consultation. The City reviewed and considered this information during preparation of this chapter.

Cultural resources include districts, sites, buildings, structures, or objects generally older than 50 years and considered important to a culture, subculture, or community for scientific, traditional, religious, or other reasons. They include prehistoric, historic-era, and tribal cultural resources (TCRs) (the latter as defined by AB 52, Statutes of 2014, in Public Resources Code Section 21074).

Archaeological resources are locations where human activity has measurably altered the earth or left deposits of prehistoric or historic-era physical remains (e.g., stone tools, bottles, former roads, house foundations). Historical resources include standing buildings (e.g., houses, barns, outbuildings, cabins), intact structures (e.g., dams, bridges, wells), or other remains of humans' alteration of the environment (foundation pads, remnants of rock walls).

TCRs were added as a distinct resource subject to review under CEQA, effective January 1, 2015, under AB 52. This is a new category of resources under CEQA and includes site features, places, cultural landscapes, and sacred places or objects, which are of cultural value to a tribe. This new category of resources was added in order to recognize that tribes have unique knowledge and information about sensitive resources important to tribal communities.

10.5.2 ETHNOGRAPHIC SETTING, 1900-PRESENT, PAGE 4.9-4

Revisions have been made to add modern setting information.

~~Today, Nisenan descendants are reinvesting in their traditions, and represent a growing and thriving community.~~

1900-Present

Following documentation by the United States Department of Interior for the existence of a separate, cohesive band of Maidu and Miwok Indians, occupying a village on the outskirts of the City of Auburn in Placer County, the United States government acquired land in trust for the Auburn Band in 1917 near the City of Auburn and formally established a reservation, known as the Auburn Rancheria. Tribal members continued to live on the reservation as a community despite great adversity.

However, in 1967, the United States terminated federal recognition of the Auburn Band. Finally, in 1970, President Nixon declared the policy of termination a failure. In 1976, both the United States Senate and House of Representatives expressly repudiated this policy in favor of a new federal policy entitled Indian Self-Determination.

In 1991, surviving members of the Auburn Band reorganized their tribal government as the United Auburn Indian Community (UAIC) and requested that the United States to formally restore their federal recognition. In 1994, Congress passed the Auburn Indian Restoration Act, which restored the Tribe's federal recognition. The Act provided that the Tribe may acquire land in Placer County to establish a new reservation.

Today, Nisenan descendants and other tribes are reinvesting in their traditions and represent a growing and thriving community that is actively involved in defining their role as stewards of their ancestor's sites, including the identification of TCRs. TCRs provide the backdrop to:

- ▶ religious understanding;
- ▶ traditional stories;
- ▶ knowledge of resources, such as varying landscapes, bodies of water, animals and plants; and
- ▶ self-identity.

Knowledge of place is central to the continuation and persistence of culture, even if former Nisenan and Miwok occupants live removed from their traditional homeland. Consulting tribes view these interconnected sites and places as living entities; their associations and feeling persist and connect with descendant communities.

10.5.3 NATIVE AMERICAN CONSULTATION, PAGE 4.9-19

Revisions reflect the approval of the City's Internal Guidance for Management of Tribal Cultural Resources and Consultation.

The City of Roseville consulted with UAIC and incorporated their recommendations in the Open Space and Conservation Element of the proposed General Plan Update and the City's ~~draft~~ Internal Guidance for Management of Tribal Cultural Resources and Consultation (Internal Guidance, see Appendix E). This Internal Guidance is organized into two parts. First is the City's position on tribal participation during the project planning and approval process for discretionary projects. This includes both private sector and public (City) projects, which are subject to state and local laws and regulations that are under the jurisdiction of the City. It also includes guidance

for City planners on determining when mitigation measures related to Native American participation are warranted under CEQA, standard treatment and mitigation measures that can be used consistently in project planning, and guidance on the City's use of public funding when conducting consultation. Second, this guidance document also provides information and guidance for City staff and contractors during the project construction and implementation phases. This includes guidance for payment for tribal participation, instructions for contractors in the event of an unanticipated discovery, and guidance for City staff in assessing and acting upon unanticipated discoveries. The City may update this guidance periodically, as appropriate.

10.5.4 IMPACT 4.9-1, REVISION TO POLICY OS4.10, PAGE 4.9-31

In consultation with Native American Tribal representatives, the City elected to make a revision to Policy OS4.10.

- ▶ Policy OS4.10: Provide opportunities to for public awareness and education through coordination with the Roseville Historical Society, ~~and~~ local schools, and culturally affiliated California Native American tribes.

10.5.5 IMPACT 4.9-2, ADDITION OF TRIBAL CULTURAL RESOURCES, PAGE 4.9-33

Additional text clarifies that tribal cultural resources, in addition to archaeological resources could be affected by future changes in the Planning Area.

It is estimated that buildout of the General Plan could accommodate the construction of between 20,000 to 25,000 housing units, 25 to 30 million square feet of non-residential building space, facilities for up to 10,000 additional K-12 students, and park and other public facilities and infrastructure to support such development throughout the Planning Area. Individual development projects within the Planning Area would involve grading, excavation or other ground-disturbing activities which could disturb or damage any as-yet-undiscovered archaeological resources. It is possible that TCRs, prehistoric, or historic-age archaeological resources have been covered by later deposits that could be removed, exposing the cultural deposits during project-related construction activities. Prehistoric archeological or TCRs indicators can include: obsidian and chert flakes and flaked stone tools; ground stone implements (grinding slabs, mortars and pestles) and locally darkened midden soils containing some of the previously listed items plus fragments of burned and unburned faunal bone and fire affected stones. Historic-era site indicators generally include: fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations, privy pits, wells, and dumps.

10.5.6 IMPACT 4.9-2, REVISIONS TO POLICIES OS4.10, NEW POLICY OS4.12, AND REVISED CONCLUSION TEXT, PAGE 4.9-34

Revised text shows changes to policies and clarifies that archaeological resources can also be tribal cultural resources or associated with tribal cultural resources.

- ▶ Policy OS4.10: Provide opportunities to for public awareness and education through coordination with the Roseville Historical Society, and local schools, and culturally affiliated California Native American tribes.
- ▶ Policy OS4.12: The City will continue to coordinate with Native American Tribes that are traditionally and culturally affiliated with resources in the Planning Area on management of, and access to City properties that have Tribal Cultural Resources.

The proposed General Plan Update policy changes listed above would result in improved protection for historical resources and would not result in any adverse environmental impacts.

Conclusion

Existing General Plan Archaeological, Historic, and Cultural Resources Policies 1, 2, 4, 7, and 8 (listed previously in the Regulatory Framework section, and which have been renumbered for the proposed General Plan Update), as well as revised proposed General Plan Update Goal OS4.1 and Policies OS4.1, OS4.4, OS4.6, OS4.7, OS4.9, ~~and OS4.10,~~ and OS4.12 listed above, would protect archaeological resources, including those which are TCRs or may be associated with TCRs, since a resource may be both an archeological resource and a TCR, or be associated with a TCR. In addition, the existing General Plan contains implementation measures such as referral of development projects to the SHPO and NAHC, preparation of site-specific archaeological surveys, proper treatment of materials encountered during construction activities, incorporation of measures to protect archaeological resources, protection of archaeological resources in parks and open space areas, and interagency cooperation to identify and preserve resources. These goals, policies, and implementation measures establish review procedures that would help to protect archaeological resources. However, significant impacts to archaeological resources may still occur.

10.5.7 IMPLEMENTATION MEASURE 4.9-2A, PAGE 4.9-35 AND 36

Through consultation with Native American Tribal representatives, the City has added clarifications to this Implementation Measure, including more explicit connections with the City’s now approved Internal Guidance for Management of Tribal Cultural Resources and Consultation.

Mitigation Measure 4.9-2a – The proposed General Plan Update should be amended as follows:

Implementation Measure

Projects that could have significant adverse impacts to potentially significant archaeological resources shall be required to assess impacts and provide feasible mitigation. The following steps, or those determined to be equally as effective by the City, will be followed:

- a. Request information from the California Native American Heritage Commission to obtain a review of the Sacred Lands File and a list of local Native American groups and individuals that may have specific knowledge of cultural resources in the area that could be affected by project implementation. Each Native American group and individual identified by the Native American Heritage Commission will be contacted to obtain any available information on cultural resources in the project area.

Additional consultation with relevant tribal representatives may be appropriate, depending on the relative level of cultural sensitivity, as identified by Native American groups or individuals.

- b. Request updated information from the North Central Information Center of the California Historical Resources Information System (California State University, Sacramento) to determine whether the project area has been previously surveyed and whether archaeological resources were identified. In the event the records indicate that no previous survey has been conducted or existing survey data is greater than five years old, the applicant will retain the services of a qualified archaeologist to assess the adequacy of the existing data (if any) and assess the archaeological sensitivity of the project area. If the survey did not meet current professional standards or regulatory guidelines, or relies on outdated information, a qualified archaeologist will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources.
- c. If a survey is warranted, it will include all necessary background research, including that resulting from consulting with traditionally and culturally affiliated California Native American tribes in addition to an archaeological pedestrian survey. Based on findings of the survey, additional technical studies may be required, such as geoarchaeological sensitivity analysis, or other analysis scaled according to the nature of the individual project. A report will document the results of the survey and provide appropriate management recommendations, and include recordation of identified archaeological resources on appropriate California Department of Parks and Recreation site record forms and cultural resources reports.
- d. Management recommendations may include, but are not limited to additional studies to evaluate identified sites or archaeological monitoring at locations determined by a qualified archaeologist in consultation with culturally affiliated California Native American tribes to be sensitive for subsurface cultural resource deposits. The City will determine the need for tribal monitoring based upon the guidance provided in Volume I of the City's Internal Guidance for Management of Tribal Cultural Resources and Consultation.
- e. Once approved by the City, provide the North Central Information Center with appropriate California Department of Parks and Recreation site record forms and cultural resources reports for any resources identified. Any subsequent reports completed as a result of additional technical work will likewise be submitted to the Northcentral Information Center.
- f. If no archeological resources, including those which are TCRs or are associated with a TCR, are identified that may be directly or indirectly impacted by project activities, mitigation is complete as there would be no adverse change to documented archeological resources. The exception would be in the event of the discovery of a previously unknown archaeological site inadvertently exposed during project implementation. In such an event, a qualified archaeologist will be retained to assess the discovery and provide management recommendations as necessary, in accordance with the City's Internal Guidance for Management of Tribal Cultural Resources and Consultation Section 3.2.
- g. When a project will impact a known archaeological site, including those determined to be a TCR, and avoidance is not a feasible option, a qualified archaeologist, in consultation with traditionally and culturally affiliated California Native American tribes, shall evaluate the eligibility of the site for

listing in the California Register of Historical Resources. If the archaeological site is found to be a historical resource as per CEQA Guidelines Section 15064.5 (a)(3), the qualified archaeologist shall recommend further mitigative treatment, which could include preservation in place or data recovery, consistent with Internal Guidance for Management of Tribal Cultural Resources and Consultation Section 3.2.4.

- h. ~~If a site to be tested is prehistoric, local tribal representatives should be afforded the opportunity to monitor the ground disturbing activities~~ the City should determine the need for tribal monitoring based upon the guidance provided in Volume I of the Internal Guidance for Management of Tribal Cultural Resources and Consultation Section 2.4.4.
- i. Appropriate mitigation may include curation of artifacts removed during subsurface testing, consistent with the City's Internal Guidance for Management of Tribal Cultural Resources and Consultation.
- j. If significant archaeological resources that meet the definition of historical or unique archaeological resources, including those determined by the City to be TCRs, are identified in the project area, the preferred mitigation of impacts is preservation in place. If impacts cannot be avoided through project design, appropriate and feasible treatment measures are required, which may consist of, but are not limited to actions, such as data recovery excavations. If only part of a site will be impacted by a project, data recovery will only be necessary for that portion of the site. Data recovery will not be required if the implementing agency determines prior testing and studies have adequately recovered the scientifically consequential information from the resources. Studies and reports resulting from the data recovery shall be deposited with the North Central Information Center. Archaeological sites known to contain human remains shall be treated in accordance with the provisions of Section 7050.5 of the Health and Safety Code, as outlined in the City's Internal Guidance for Management of Tribal Cultural Resources and Consultation.

10.5.8 IMPLEMENTATION MEASURE 4.9-2B, PAGE 4.9-37 AND 38

Through consultation with Native American Tribal representatives, the City has added clarifications to this Implementation Measure to more directly connect with the City's now approved Internal Guidance for Management of Tribal Cultural Resources and Consultation.

Mitigation Measure 4.9-2b – The General Plan Update should be amended as follows:

Implementation Measure

Projects that could have significant adverse impacts to undiscovered, potentially significant archaeological resources and/or TCRs which may be discovered during construction shall be required to implement the Post-Review Discovery Procedures within Volume II Part C of the City's Internal Guidance for Management of Tribal Cultural Resources and Consultation ~~following steps, or those determined to be equally as effective by the City.;~~

- a. ~~During ground disturbing activities necessary to implement proposed development and infrastructure projects, if any prehistoric or historic subsurface archaeological resources are~~

~~discovered, all work within 100 feet of the resources shall be halted and a qualified archaeologist shall be consulted within 24 hours to assess the significance of the find, in consultation with culturally affiliated California Native American tribes, and according to CEQA Guidelines Section 15064.5, and implement, as applicable, CEQA Guidelines Sections 15064.5(d), (e), and (f).~~

- ~~b. If any find is determined to be a historical resource according to CEQA Guidelines Section 15064.5, or a TCR according to Public Resources Code Section 21074, representatives from the City and the archaeologist will meet to determine the appropriate avoidance measures or other appropriate mitigation according to the guidelines outlined in the City's Internal Guidance for Management of Tribal Cultural Resources and Consultation. Cultural resources shall be recorded on appropriate Department of Parks and Recreation forms, and all significant cultural materials recovered shall be, as necessary and at the discretion of the qualified archaeologist and in consultation with the local Native American community if the discovery is prehistoric in age, subject to scientific analysis, professional curation, and documentation according to professional standards. If it is determined that the proposed development or infrastructure project could damage a historical resource or a unique archaeological resource (as defined pursuant to the CEQA Guidelines), mitigation shall be implemented in accordance with Section 21083.2 of the California Public Resources Code and CEQA Guidelines Section 15126.4, with a preference for preservation in place. Work may proceed on other parts of the project site while mitigation for historical resources or unique archaeological resources is being carried out. Preservation in place may be accomplished by planning construction to avoid the resource; incorporating the resource within open space; capping and covering the resource; or deeding the site into a permanent conservation easement.~~
- ~~e. If avoidance is not feasible, the qualified archaeologist, s in consultation with culturally affiliated California Native American tribes shall develop and oversee the execution of a treatment plan. The treatment plan shall include, but shall not be limited to, data recovery procedures based on location and type of archaeological resources discovered and a preparation and submittal of report of findings to the Northwest Information Center of the California Historical Resources Information System. Data recovery shall be designed to recover the significant information the archaeological resource is expected to contain, based on the scientific/historical research questions that are applicable to the resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable resource questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by project proponents' actions. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical.~~

10.5.9 IMPACT 4.9-38, SIGNIFICANCE AFTER MITIGATION, PAGE 4.9-38

A minor revision is included to clarify that the City's implementation measures apply to tribal cultural resources, as well as cultural resources.

Significance after Mitigation

The existing General Plan and proposed General Plan Update policies and implementation measures summarized above, along with implementation of Mitigation Measures 4.9-2a and 4.9-2b, establish appropriate review procedures and consultation requirements, while also addressing the need for qualified personnel to undertake technical analysis, where necessary. These policies and implementation programs provide for the identification and evaluation of cultural resources, including those which may also be TCRs, as well as for the assessment of potential impacts to such resources and the development of mitigation strategies. Additionally, CEQA review and local regulatory review, including mitigation measures that have been adopted as part of existing Specific Plans, provide additional levels of protection for known resources and address the identification of unidentified cultural resources. Because prehistoric and historic-era archaeological sites can occur below ground with little or no surface manifestation it may not be feasible to entirely avoid impacts during buildout of the General Plan, despite implementation of state and federal laws and the City's proposed policies and mitigation measures. If unknown archaeological resources are encountered during construction without prior discovery, they may be inadvertently damaged or destroyed. No other feasible mitigation measures are available. Therefore, this impact remains significant and unavoidable.

10.5.10 IMPACT 4.9-3, PAGE 4.9-38

A minor revision is included to provide consistency in nomenclature for the study area.

IMPACT 4.9-3 **Disturb Any Human Remains, Including Those Interred Outside of Formal Cemeteries.** *The general project vicinity is known to have been heavily used by Native American groups prehistorically; in addition, Roseville was settled by European immigrants by the mid-19th century. While some burial ground locations (generally from the historic-era) are known, there is the possibility that ground disturbing activities in the ~~general plan update area~~ Planning Area could encounter prehistoric, historic-era, or other human remains. This impact is considered to be **significant**.*

10.5.11 IMPACT 4.9-3, CONCLUSION, PAGE 4.9-39

Additional text provides an update related to the City's Internal Guidelines and notes that these Guidelines are consistent with State law.

Conclusion

Existing General Plan Archaeological, Historic, and Cultural Resources Policies 1, 2, 4, 7, and 8 (listed previously in the Regulatory Framework section, and which have been renumbered for the proposed General Plan Update), as well as revised proposed General Plan Update Goal OS4.1 and Policies OS4.1 and OS4.4 listed above, would protect cultural resources, including human remains. In addition, the existing General Plan contains implementation measures, such as

referral of development projects to the SHPO and NAHC, preparation of site-specific archaeological surveys, proper treatment of materials encountered during construction activities, incorporation of measures to protect archaeological resources, protection of archaeological resources in parks and open space areas, and interagency cooperation to identify and preserve resources. These goals, policies, and implementation measures establish general review procedures that would help to protect archaeological resources.

In addition, the City has developed and adopted guidance for consultation and management of cultural and TCRs. This includes procedures which must be followed upon discovery or human remains, or potential human remains. These procedures conform to California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. However, significant impacts to cultural resources, including human remains, may still occur.

10.5.12 IMPLEMENTATION MEASURE 4.9-3, PAGE 4.9-39

Revisions are provided to reflect the fact that the City's Internal Guidelines are now approved.

Management of Tribal Cultural Resources and Consultation

Projects that could have significant adverse impacts to human remains or potential human remains shall implement the applicable procedures and recommended mitigation within the City's Internal Guidance for Management of Tribal Cultural Resources and Consultation.~~The City will develop and implement guidance for consultation and management of cultural and tribal cultural resources. This guidance should have two parts. First is the City's position on tribal participation during the project planning and approval process for discretionary projects. This includes both private sector and public (City) projects, which are subject to State and local laws and regulations that are under the jurisdiction of the City. It should also include guidance for City planners on determining when mitigation measures related to Native American participation are warranted under CEQA, standard treatment and mitigation measures that can be used consistently in project planning, and guidance on the City's use of public funding when conducting consultation. Second, this guidance document should also provide information and guidance for City staff and contractors during the project construction and implementation phases. This includes thresholds for payment for tribal participation, instructions for contractors in the event of an unanticipated discovery, and guidance for City staff in assessing and acting upon unanticipated discoveries. The City may update this guidance periodically, as appropriate.~~

10.5.13 IMPACT 4.9-4, PAGE 4.9-40

Revisions are provided to clarify that tribal cultural resources can be historic era.

Numerous prehistoric and historic-era archaeological sites have been identified as part of investigations conducted for Specific Plans in the city, including the Maidu Indian Sites. Prehistoric and historic-era resources also may be considered TCRs and can include sites, features, and objects that are CRHR-listed, eligible to be listed, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). The United Auburn Indian Community (UAIC) stated that there are TCRs within the Planning Area. State and federal law

requires maintaining confidentiality of the location and nature of archaeological sites and TCRs, and therefore this EIR does not include an exhibit or physical description their locations. However, based on information provided by UAIC during consultation on this project, development projects within the Planning Area which would involve grading, excavation or other ground-disturbing activities could disturb or damage TCRs.

10.5.14 IMPACT 4.9-4, REVISION TO POLICY OS4.10 AND NEW POLICY OS4-12

In consultation with Native American Tribal representatives, the City revised a policy and added a policy.

- ▶ Policy OS4.10: Provide opportunities to for public awareness and education through coordination with the Roseville Historical Society, and local schools, and culturally affiliated California Native American tribes.
- ▶ Policy OS4.12: The City will continue to coordinate with Native American Tribes that are traditionally and culturally affiliated with resources in the Planning Area on management of, and access to City properties that have Tribal Cultural Resources.

10.5.15 IMPACT 4.9-4, CONCLUSION AND SIGNIFICANCE AFTER MITIGATION, PAGE 4.9-41

The conclusion and post-mitigation discussion has been edited to refer to revised policies and expand the discussion of the benefit of Mitigation Measure 4.9-4.

Conclusion

Existing General Plan Archaeological, Historic, and Cultural Resources Policies 1, 2, 4, 7, and 8 (listed previously in the Regulatory Framework section, and which have been renumbered for the proposed General Plan Update), as well as revised proposed General Plan Update Goal OS4.1 and Policies OS4.1, OS4.4, OS4.9, ~~and~~ OS4.10, and OS4.12 listed above, would help to protect tribal cultural resources. In addition, the existing General Plan contains implementation measures, such as referral of development projects to the SHPO and NAHC, preparation of site-specific archaeological surveys, proper treatment of materials encountered during construction activities, incorporation of measures to protect archaeological resources, protection of archaeological resources in parks and open space areas, and interagency cooperation to identify and preserve resources. These goals, policies, and implementation measures establish general review procedures that would help to protect tribal cultural resources. However, significant impacts to tribal cultural resources may still occur.

Mitigation Measure

Mitigation Measure 4.9-4 – Implement Mitigation Measure 4.9-3 (Projects that could have significant adverse impacts to human remains or potential human remains shall implement the applicable procedures and recommended mitigation within the City’s Internal Guidance for Management of Tribal Cultural Resources and Consultation).

Significance after Mitigation

Mitigation Measure 4.9-4 requires the implementation of the City's Internal Guidance for Management of Tribal Cultural Resources and Consultation, which was itself developed in extensive consultation with Native American Tribal representatives. This document includes guidance for consultation and management of cultural and tribal cultural resources, including tribal participation during the project planning and approval process for discretionary projects, as well as guidance for City planners on determining when mitigation measures related to Native American participation are warranted under CEQA and standard treatment and mitigation measures that can be used consistently in project planning. This Internal Guidance also identifies instructions for contractors in the event of an unanticipated discovery and guidance for City staff in assessing and acting upon unanticipated discoveries. While the existing laws, General Plan policies, and implementation programs, along with proposed General Plan Update policies and implementation of Mitigation Measure 4.9-4 will reduce potential effects, the potential remains for residual effects. No other feasible mitigation measures are available. Therefore, the impact of development in the General Plan Planning Area to TCRs is considered significant and unavoidable.

10.6 APPENDIX B

Appendix B has been revised to include the detailed calculations for the efficiency thresholds and to ensure consistency between the appendix and body of the EIR for emissions estimates.

10.7 APPENDIX E

Following circulation of the Draft General Plan Update EIR, the City approved the Internal Guidance for Management of Tribal Cultural Resources and Consultation (Internal Guidance). This has been added as Appendix E to the General Plan Update EIR.

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