

## **APPENDIX A3**

### **Comments on 2011 Draft Subsequent EIR**

---

**CENTRAL VALLEY FLOOD PROTECTION BOARD**

3310 El Camino Ave., Rm. 151  
SACRAMENTO, CA 95821  
(916) 574-0609 FAX: (916) 574-0682  
PERMITS: (916) 574-2380 FAX: (916) 574-0682

**RECEIVED****DEC 08 2011**Planning & Redevelopment  
Department

December 7, 2011

Mr. Ron Miller  
City of Roseville  
311 Vernon Street  
Roseville, California 95630

Subject: Fiddymont Ranch Specific Plan Amendment 3 SCH Number: 2002082057  
Supplemental/Subsequent EIR

Dear Mr. Miller:

Staff for the Central Valley Flood Protection Board has reviewed the subject document and provides the following comments:

The proposed project is located within the jurisdiction of the Central Valley Flood Protection Board. The Board is required to enforce standards for the construction, maintenance, and protection of adopted flood control plans that will protect public lands from floods. The jurisdiction of the Board includes the Central Valley, including all tributaries and distributaries of the Sacramento River and the San Joaquin River, and designated floodways (Title 23 California Code of Regulations (CCR), Section 2).

A Board permit is required prior to starting the work within the Board's jurisdiction for the following:

- The placement, construction, reconstruction, removal, or abandonment of any landscaping, culvert, bridge, conduit, fence, projection, fill, embankment, building, structure, obstruction, encroachment, excavation, the planting, or removal of vegetation, and any repair or maintenance that involves cutting into the levee (CCR Section 6);
- Existing structures that predate permitting or where it is necessary to establish the conditions normally imposed by permitting. The circumstances include those where responsibility for the encroachment has not been clearly established or ownership and use have been revised (CCR Section 6);
- Vegetation plantings that will require the submission of detailed design drawings; identification of vegetation type; plant and tree names (i.e. common name and scientific name); total number of each type of plant and tree; planting spacing and irrigation method that will be utilized within the project area; a complete vegetative management plan for maintenance to prevent the interference with flood control, levee maintenance, inspection and flood fight procedures (Title 23, California Code of Regulations CCR Section 131).

December 1, 2011  
Mr. Ron Miller  
Page 2 of 2

In accordance with CEQA Guidelines Section 15130 "Discussion of Cumulative Impacts. (a) An EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in section 15065(a)(3). Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," the lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable."

Vegetation requirements in accordance with Title 23, Section 131(c) states, "Vegetation must not interfere with the integrity of the adopted plan of flood control, or interfere with maintenance, inspection, and flood fight procedures."

The accumulation and establishment of woody vegetation that is not managed has a negative impact on channel capacity and increases the potential for flooding. When a channel develops vegetation that then becomes habitat for wildlife, maintenance to initial baseline conditions becomes more difficult as the removal of vegetative growth is subject to federal and state agency requirements for on-site mitigation within the floodway.

Hydraulic impacts – Hydraulic impacts due to encroachments could impede flows, reroute flood flows, and/or increase sediment accumulation. The Supplemental EIR should include mitigation measures for channel improvements and maintenance to prevent and/or reduce hydraulic impacts. Off-site mitigation outside of the State Plan of Flood Control should be used when mitigating for vegetation removed within the project location.

The permit application and Title 23 CCR can be found on the Central Valley Flood Protection Board's website at <http://www.cvpfb.ca.gov/>. Contact your local, federal and state agencies, as other permits may apply.

Should you have any further questions, please contact me by phone at (916) 574-0651, or via email at [jherota@water.ca.gov](mailto:jherota@water.ca.gov).

Sincerely,



James Herota  
Staff Environmental Scientist  
Floodway Projects Improvement Branch

cc: Governor's Office of Planning and Research  
State Clearinghouse  
1400 Tenth Street, Room 121  
Sacramento, California 95814

December 12, 2011

SENT VIA: [egov@roseville.ca.us](mailto:egov@roseville.ca.us)  
[rmiller@roseville.ca.us](mailto:rmiller@roseville.ca.us)

Ron Miller  
Planning & Housing Department  
City of Roseville  
311 Vernon Street  
Roseville, CA 95647

**SUBJECT: Fiddymment Ranch Phase 3 Specific Plan Amendment and associated Draft Subsequent Environmental Impact Report**

Dear Mr. Miller,

Thank you for submitting the Fiddymment Ranch Phase 3 Specific Plan Amendment (Project) and associated Draft Subsequent Environmental Impact Report (DEIR) to the Placer County Air Pollution Control District (District) for review. The Project proposes to amend the West Roseville Specific Plan to accommodate 1,905 additional residential units and 79,170 square feet of commercial land uses in the City of Roseville. The project site is located within the Sacramento Valley Air Basin (SVAB) and is designated as nonattainment for federal and state ozone (O<sub>3</sub>) standards, nonattainment for the federal particulate matter standard (PM<sub>2.5</sub>) and state particulate matter standard (PM<sub>10</sub>).

After review of the Project and DEIR, the District has the following comments regarding the analyses of the Project's impacts on local and regional air quality.

**Short-term Construction-related Emissions**

1. The District recommends that the District's rules and regulations should be listed as standard notes on all grading/improvement plans as a condition of approval for all subsequent projects.

For example, District Rule 228, Fugitive Dust establishes standards to be met by activities generating fugitive dust which applies to the entire County of Placer and addresses fugitive dust generated by construction and grading activities, and by other land use practices. All construction related activities associated with the buildout of the Project would be subject to District rules and regulations in effect at the time of construction. The District; therefore, recommends the City to list the District's rules and regulations as standard notes on all

grading/improvement plans as a condition of approval for the Project (See Attachment 1: "District and State Rule Based Requirements: City Improvement Plans") to ensure that the contractor will be fully aware of the regulatory requirement.

2. The District recommends Mitigation Measure 7.1b identify contractors who supply fleets of equipment (minimum 50% of fleet) which provide Tier 3 level engines or greater. This measure should also be shown as a standard note on all subsequent grading and/or improvement plans.

The air quality modeling analysis (CalEEMod) prepared for the DEIR identified mitigation in an effort to reduce construction related criteria pollutants. Emissions were reduced with the requirement to have contractors supply 50% of construction equipment fleet consisting of Tier 3 level engines which also meet a minimum of a Level 1 Diesel Particulate Filter (DPF) for new construction/off-road equipment, or retrofit to meet this standard for fleets with older equipment<sup>1</sup>. The District believes if a project claims credit for mitigation in the analysis, the mitigation should be incorporated as a mitigation measure in the DEIR. The District; therefore, recommends Mitigation Measure 7.1b specify the requirement to supply 50% of the equipment fleet use Tier 3 level engines or greater during all construction related phases of the Project. This measure should also be listed as a standard note on all subsequent grading and/or improvement plans.

3. The modeling analysis also identified as mitigation, limiting VOC emissions associated with the use of coatings, paint and sealants (implement at 50 g/L for interior, and 100 g/L for exterior) during the construction phase. Therefore, this measure should be incorporated as a Condition of Approval for all subsequent projects<sup>2</sup>.
4. The modeling analysis should include emissions associated with the construction of the parking areas for non-residential land use types.

The modeling analysis prepared to estimate the Project's construction related emissions does not include emissions associated with the buildout of parking areas for the proposed nonresidential land uses. For all project types except residential, parking is to be evaluated as a separate land use in CalEEMod to calculate more accurate construction phase emissions for VOC and PM fugitive dust emissions. The District does not anticipate the increase in emissions would change the environmental conclusion or require the identification of new mitigation measures.

## **Long-term Operational Emissions**

### Criteria Pollutants & Toxic Air Contaminants Analysis and Mitigation

---

1 Appendix D Air Quality Impact Analysis "CalEEMod SPA3 Assumptions List"

2 Appendix D Air Quality Impact Analysis Section 5.0 page 5-38

5. The District recommends the following modification to MM 7.2a.

*Wood burning or pellet appliances shall not be permitted within the Fiddymont Development. Natural gas or propane fired fireplace appliances shall be clearly delineated on the Floor Plans submitted in conjunction with the Building Permit application.*

The DEIR and CalEEMod modeling analysis assume no wood burning devices will be permitted within the development.

### **Cumulative Impacts**

6. The District recommends updating the fee amount to reflect the current rate of \$16,640 as established by the California Air Resources Board Carol Moyer Guidelines

Mitigated operational emissions associated with the Project are estimated to result in 309.24 lbs/day of ROG and 227.97 lbs/day of NOx<sup>3</sup>. Impact 11.10 of the DEIR concludes that the Project would exceed the Placer County APCD recommended cumulative threshold of 10 lbs/day for ROG and NOx<sup>4</sup> and will result in a cumulatively considerable net increase of ROG and NOx emissions for which the project region is non-attainment under the Federal and State Air Quality Standards.

Mitigation Measure 11.10a has been proposed to offset the Project's long-term criteria pollutant emissions in order to reduce ROG and NOx emissions from the Project<sup>5</sup>. The rate at which emissions would be offset has previously been based on \$14,300 per ton, as stated within the mitigation measure. The District recommends the City shall consider updating the fee amount in the DEIR to \$16,640 as the cost-effectiveness limit established by the California Air Resources Board Carol Moyer Guidelines<sup>6</sup>. Cost-effectiveness is a measure of the dollars provided to a project for each ton of covered emission reduced. The updated fee is currently recommended by the Sacramento Metropolitan Air Quality Management District and other districts though out the State.

According to the District's Offsite Mitigation Fee Calculation Spreadsheet, the Project will be required to offset 27.23 tons of ROG and 19.84 tons of NOx<sup>7</sup>. Based on the current California Air Resource Board Carol Moyer Guidelines, the total offsite mitigation fee is estimated as \$783,180, equivalent to \$187.54/dwelling unit.

---

3 Appendix D: Air Quality Impact Analysis, Section 5.0, Table 12, page 5-42.

4 DEIR, IMPACT 11.10, page 11-19

5 DEIR, IMPACT 11.10, page 11-20

6 Carl Moyer Program Guidelines Appendix G: Cost Effectiveness Limit and Capital Recovery Factors (Updated April, 2011).

7 Placer County Air Pollution Offsite Mitigation Fee Calculation for City of Roseville Fiddymont Ranch Phase 3 SPA

7. Table 11.12 should be corrected to reflect the District's recommended cumulative threshold of 10 lbs/day.

Table 11.12: Mitigated Operational Emissions preceding the discussion appears to have inadvertently used the District's construction and project level threshold of 82 lbs/day. The cumulative threshold identified in Table 11.12 should be corrected to reflect 10 lbs/day.

8. The District recommends the incorporation of the following condition of approval for all subsequent projects.

Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require a permit(s) from the District. The applicant, developer, or operator who proposes the use of an emergency generator, boiler, or heater should contact the District early to determine if a permit is required, and to begin the permit application process. Portable construction equipment (e.g., generators, compressors, pile drivers, lighting equipment) with an internal combustion engine over 50 horsepower are required to have a PCAPCD permit or a California Air Resources Board portable equipment registration.

Processes that discharge 2 pounds per day or more of air contaminants, as defined by Health and Safety Code Section 39013, to the atmosphere shall obtain a permit prior to operation. **Permits are required for both construction and operation.** Developers/contractors should contact the District prior to construction and obtain any necessary permits prior to the issuance of a Building Permit. *(Based on the California Health & Safety Code section 39013:* <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=hsc&group=39001-40000&file=39010-39060>

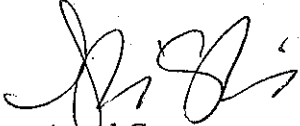
### **Greenhouse Gas (GHG) Emissions**

9. The discussion for Section 8.1 and 8.4 should reflect 4,176 residential units and not 4,716 units.
10. Mitigation Measure 8.2a should identify the nonresidential BuildItGreen score required for the commercial, school, and other nonresidential land use types sufficient enough to achieve the 15% reduction in energy related GHG emissions.

Based on the modeling assumptions in the CalEEMod modeling analysis, the exceedence of the Title 24 building code for all development (residential and nonresidential) would achieve GHG emission reductions necessary to reduce impacts to a less-than-significant level. However, the mitigation measure does not specify the non-residential development BuildItGreen score necessary to achieve this reduction, as assumed in the analysis.

Again, thank you for submitting this project for review. Please do not hesitate to contact me at 530.745.2333 or via email at [agreen@placer.ca.gov](mailto:agreen@placer.ca.gov) if you have any questions.

Respectfully submitted,



Angel Green  
Associate Planner

cc: Yu-Shuo Chang, Senior Planner, PCAPCD

Enclosure (2)

ATTACHMENT 1

**District and State Rule Based Requirements  
City Improvement Plans**

The following standard notes are recommended as a standard condition of approval or construction document language for all development projects within the Placer County Air Pollution Control District (APCD). These notes should be included on all Improvement Plans, Grading Plans, and/or Design Review Permits, including those projects exempt by CEQA.

- R1. Include the following standard note on the Improvement/Grading Plan: Construction equipment exhaust emissions shall not exceed Placer County APCD Rule 202 Visible Emission limitations. Operators of vehicles and equipment found to exceed opacity limits are to be immediately notified by APCD to cease operations and the equipment must be repaired within 72 hours. *(Based on APCD Rule 202)*
- R2. Include the following standard note on the Improvement/Grading Plan: The contractor shall suspend all grading operations when fugitive dust exceeds Placer County APCD Rule 228 (Fugitive Dust) limitations. The prime contractor shall be responsible for having an individual who is CARB-certified to perform Visible Emissions Evaluations (VEE). This individual shall evaluate compliance with Rule 228 on a weekly basis. It is to be noted that fugitive dust is not to exceed 40% opacity and not go beyond the property boundary at any time. Lime or other drying agents utilized to dry out wet grading areas shall not exceed Placer County APCD Rule 228 limitations. Operators of vehicles and equipment found to exceed opacity limits will be notified by APCD and the equipment must be repaired within 72 hours. *(Based on APCD Rule 228)*
- R3. Include the following standard note on the Improvement/Grading Plan: The prime contractor shall be responsible for keeping adjacent public thoroughfares clean of silt, dirt, mud, and debris, and shall “wet broom” the streets (or use another method to control dust as approved by the individual jurisdiction) if silt, dirt, mud or debris is carried over to adjacent public thoroughfares. *(Based on APCD Rule 228 / section 401.5)*
- R4. Include the following standard note on the Improvement/Grading Plan: During construction, traffic speeds on all unpaved surfaces shall be limited to 15 miles per hour or less. *(Based on APCD Rule 228 / section 401.2)*
- R5. a). Include the following standard note on the Improvement/Grading Plan: In order to minimize wind driven dust during construction, the prime contractor shall apply methods such as surface stabilization, establishment of a vegetative cover, paving, (or use another method to control dust as approved by the individual jurisdiction).

- b). Include the following standard note on the Improvement/Grading Plan: The prime contractor shall suspend all grading operations when wind speeds (including instantaneous gusts) are excessive and dust is impacting adjacent properties. *(Based on APCD Rule 228 / section 402)*
- R6. Include the following standard note on the Improvement/Grading Plan: The contractor shall apply water or use other method to control dust impacts offsite. Construction vehicles leaving the site shall be cleaned to prevent dust, silt, mud, and dirt from being released or tracked off-site. *(Based on APCD Rule 228 / section 401.1, 401.4)*
- R7. Include the following standard note on the Improvement/Grading Plan: During construction, no open burning of removed vegetation shall be allowed unless permitted by the PCAPCD. All removed vegetative material shall be either chipped on site or taken to an appropriate recycling site, or if a site is not available, a licensed disposal site. *(Based on APCD Rule 310)*
- R8. Include the following standard note on the Improvement/Grading Plan: A person shall not discharge into the atmosphere volatile organic compounds (VOC's) caused by the use or manufacture of Cutback or Emulsified asphalts for paving, road construction or road maintenance, unless such manufacture or use complies with the provisions Rule 217. *(Based on APCD Rule 217).*
- R9. Include the following standard note on the Improvement/Grading Plan: Processes that discharge 2 pounds per day or more of air contaminants, as defined by Health and Safety Code Section 39013, to the atmosphere may require a permit. **Permits may be required for both construction and operation.** Developers/contractors should contact the District prior to construction and obtain any necessary permits prior to the issuance of a Building Permit. *(Based on the California Health & Safety Code section 39013: <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=hsc&group=39001-40000&file=39010-39060>)*

NOTE: For complete listing of APCD Rules please visit:  
<http://www.placer.ca.gov/Departments/Air/Rules.aspx>

ATTACHMENT 2

Placer County APCD Offsite Mitigation Fee Calculator

Project Name: Placer County APCD Offsite Mitigation Fee Calculation for City of Roseville Fiddymont Ranch Phase 2 SPA

Mitigation Fee Calculation

Emission Source	ROG (lbs/day)		NOx (lbs/day)		PM10 (lbs/day)	
	summer	winter	summer	winter	summer	winter
Area Resource	181.94		3.94			
Vehicle Exhaust	127.30		224.03			
<b>*Total</b>	<b>309.24</b>	<b>0.00</b>	<b>227.97</b>	<b>0.00</b>	<b>299.50</b>	<b>229.50</b>

\*DEIR Appendix D page 5-42

PCAPCD cumulative thresholds (lbs/day)	ROG (summer only)	NOx (summer only)	PM10 (winter only)
operational emissions	10	10	80

exceedence to the cumulative thresholds (lbs/day)	ROG	NOx	PM10
	299.24	217.97	149.50

# of days in summer (May-Oct)	182
# of days in winter (Nov-Apr)	183

	ROG	NOx	PM10
Required emission offset (tons) (exceed lbs/day x days in summer/winter, 2000 lbs/ton)	27.23	19.84	13.68
			0

**Amount of required emission offset for ROG and NOx (tons)** **47.07**

current mitigation cost for ROG or NOx \$/ton (per CARB Carol Moyer Guideline) \$16,640

current mitigation cost for PM \$/ton (to be determined)

**Proposed APCD Offsite Mitigation Fee (ROG + NOx)** **\$783,180**

**Proposed APCD Offsite Mitigation Fee (PM only)** **\$0**

Per Unit Based on 4,176 units

\$187.54

**Municipal Services Agency**  
Robert B. Leonard, Administrator

**Department of Transportation**  
Michael J. Penrose, Director



**County Executive**  
Bradley J. Hudson

## County of Sacramento

December 12, 2011

Ron Miller  
Planning & Housing Department  
311 Vernon Street,  
Roseville, CA 95678  
rmiller@roseville.ca.us

**SUBJECT: COMMENTS ON THE DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT FOR THE FIDDYMENT RANCH PHASE 3 SPECIFIC PLAN AMENDMENT.**

Mr. Miller:

The Sacramento County Department of Transportation has received the Notice of Availability for the Draft Subsequent Environmental Impact Report (DSEIR) for the Fiddymment Ranch Phase 3 Specific Plan Amendment. We appreciate the opportunity to review this document and thank you for addressing our scoping needs as requested in the Notice of Preparation comments for this project. We have following comments:

- **Mitigation Measure 5.8a.** In the DSEIR calls for adding a northbound and southbound lane on Walerga Road. It should be noted that County of Sacramento General Plan designates Walerga Road as a four lane arterial and further widening of Walerga Road is not considered feasible. We suggest an alternative mitigation measure such as widening Watt Avenue which is another north south connection that links Placer County, the City of Roseville and Sacramento County. The County of Sacramento General Plan designates Watt Avenue as a six lane thoroughfare. So, widening Watt Avenue is a feasible alternative mitigation measure that will provide additional north south parallel capacity to Walerga Road. We would ask the City of Roseville to revise the mitigation measure and participate in paying a fair share towards Watt Avenue widening. Please enter into an agreement with the County of Sacramento Department of Transportation to pay for this alternative mitigation measure.

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

Sincerely,

Kamal Atwal, P.E.  
Department of Transportation



*"Leading the Way to Greater Mobility"*

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

Mr. Miller

Comments on the DSEIR for the Fiddymt Ranch Phase 3 Specific Plan Amendment

Page 2

KA:ka

Cc:

Dan Shoeman, DOT

Ron Vicari, DOT

Dean Blank, DOT

Matt Darrow, DOT

Bob Davison, County Engineering

December 12, 2011

Ron Miller  
Planning & Housing Dept.  
311 Vernon St.  
Roseville, CA 95687

RE: DSEIR for West Roseville Specific Plan Amendment 3 (SPA 3)

Dear Mr. Miller:

Thank you for this opportunity to comment on the City of Roseville's draft supplemental environmental impact report (DSEIR) for the 3<sup>rd</sup> proposed plan amendment to the West Roseville Specific Plan, otherwise known as "SPA 3." As you know this plan amendment represents a 45% increase in density as compared to the original West Roseville Specific Plan (WRSP).

I would like to echo the concerns spelled out by the Westpark Fiddymont Farm Neighborhood Association (WFFNA) in the presentation prepared and submitted to the City for a meeting before the Planning Commission, which has since been postponed. It is important that the City measure the impacts of SPA 3 to the existing environmental conditions, not simply the incremental impacts between the hypothetical build out of WRSP and the new SPA 3. In addition, I do not believe all significant impacts are captured in a supplemental EIR (especially given the original EIR is seven years old), and a new EIR should be drafted. Otherwise, the public and City of Roseville decision makers cannot be assured that the identified mitigation measures for SPA 3 will be adequate.

Furthermore, SPA 3 is tailor-made to satisfy the City's Housing Element pursuant to the Sacramento Area Council of Governments (SACOG) low-income housing requirement, (SPA 3 is a "voluntary rezoning" which is directly accounted for in the Housing Element's calculus for meeting SACOG requirements in the current planning horizon). This makes the DSEIR's statement that any additional densities for which SPA 3 is eligible under the City's Density Bonus ordinance is "speculative", quite absurd. The City and the project proponent are fully aware now of the density bonus incentives for which SPA 3 will be eligible and granting of additional densities under the Density Bonus ordinance is "reasonably foreseeable" and must be disclosed and analyzed for the public and decision makers under the EIR's cumulative impacts section. The increased density incentives under the Density Bonus ordinance are significant in their own right, let alone when added to the 45% increase in density represented by SPA 3.

West Roseville is isolated from employment centers, major thoroughfares, public transportation, and shopping, to name a few. It appears that the dense housing in SPA 3 is a result of convenience, both to the project proponent looking to recoup land costs and to the

City, looking to meet SACOG requirements. Yet, this type of planning is lazy. Relying on "voluntary rezones" to make deals with developers seeking plan amendments to meet SACOG requirements will not get the City the results it should be looking for: well planned, thoughtful placement of low income and dense housing.

I believe the City should undertake a study to determine the best locations for low income and dense housing, and dispense with its over-reliance on making "behind the doors" deals with developers who happen to be seeking plan amendments, and calling these "voluntary rezones." That way, all the public and decision makers can have meaningful input to Roseville's future housing needs.

A housing study would inform the City regarding a meaningful alternative to SPA 3. The current range of alternatives is inadequate because the reduced density alternative is merely an arbitrary 20% reduction and does not meet the City's Housing Element. Again, given that SPA 3 is tailor-made to meet the City's Housing Element for low income housing, I question whether there are really any meaningful alternatives which reduce densities in West Roseville, analyzed in the DSEIR.

Thank you for your consideration.



Amy L. Aufdemberge

December 8<sup>th</sup>, 2011

**City of Roseville – Planning Commission  
311 Vernon Street  
Roseville, CA 95678**

**RE: Fiddymment Farm Specific Plan Amendment (SPA-3)**

I would like to submit my concerns over the SEIR currently pending consideration before your Commission.

SPA3 is a new project and is deserving of a full EIR, not a supplement.

I think there is significant impacts to traffic, air, noise, schools, parks, fire, police, sewer and water supply, that are not captured by a mere supplemental analysis. I believe that mitigation is, therefore, not adequately identified.

I believe that the City needs to undertake a study to determine the best location for high density residential areas, which I believe should be closer to main thoroughfares and employment centers, not isolated in West Roseville.

I also believe that the homeowners of the Fiddymment Farm homes should be considered as stakeholders in any major decisions made in regards to this region. Our concerns should be given strong consideration in the matter of the Fiddymment Farm SPA3 submission. I feel that the issues raised will have a substantial impact, not only on the residents of Fiddymment Farm, but in the overall well being of the City of Roseville.

Respectfully Submitted,

Kimberly Bowens  
2596 Ranchland Way  
Roseville, CA 95747

RECEIVED

DEC 09 2011

Planning & Redevelopment  
Department

December 8, 2011

To: The Honorable Planning Commission Members:  
Re: Fiddymment Farm Specific Plan Amendment (SPA-3)

- SPA-3 is a new project that deserves no review at all, it should be scrapped from the get go. Having made that statement, let me tell you why I feel that way. It seems like our city leaders are only interested in helping the developers get the low income housing percentage so they will continue to build. The builders will leave and the expense of the problems left behind will be for the home owners to deal with. I lived in Natomas for four years. It was great neighborhood and fully diversified. It wasn't until the city government decided to go beyond the promised numbers of apartments that our problems began. We were told the same things; it was suppose to be no big deal.

This growing neighborhood had almost zero crime incidents, so low in fact we had no police dedicated to our particular area. Soon we had thousands of apartments and with them came the rise in police incidences. The neighborhood went from 1 or 2 minor incidents a month to over 500. The incidences began small; cars were broken into, graffiti sprayed on cars and houses, fighting and theft. But it soon escalated into an arrest next door for armed robbery and the final straw only two blocks away a drive-by shooting and a murder. When the SAC PD families began to pack up and leave due to high crime, it was our wake up call. We left Natomas because of fear and a lack of personal safety and came to Roseville to remove ourselves from it and now we see this occurring all over again. The City of Roseville has a reputation for being a family oriented safe community and all the tax money and federal dollars in the world won't bring that reputation back once it has gone. Put the residents foremost in this decision.

- The full impact will never be known until it is too late. Ask our new Police Chief what the impact was in Natomas. He was a POP officer at the time in Sacramento and later head of the police team that tried to slow things down. He knows what this concentration of apartments will bring. Spread them out and not all in one place as the builder wants. I was a low income builder and I know the consequences of this kind of concentrated building.
- All services will have to be increased and there goes our taxes. Schools will need to be protected more for the younger children will have a higher risk almost immediately. Gang activity will grow between themselves and then extend out to the residence. Yes, this is a worse case scenario but even if some of it happens, it will be just one more issue to deal with in an already financially challenged budget.

- I would suggest a non-govt. team be involved when putting these statistics together. The government has access to information the residents do not and numbers can be made to say anything. Look at other projects and their impact when it comes to negative influence.
- Reduce the density. Even better yet spread it out. The builder will not like it due to higher cost but that's not our problem. This project and others like it are building a future where trouble will fester and the local residence and taxpayer will have to live with.
- Density is a good question, but we need to ask ourselves "What type of density"? Where there is a high concentration of elderly like here in Westpark and Sun City, they become targets for increased crime activity. People moved here because it was safe. This action will polarize the surrounding population and once the trouble begins there will be no stopping it. And those who would take care of the area will begin to leave. We certainly will.

As you can see, my major issue is with the increase in crime when you have high density building but the other consideration are no less important to the residents that live locally. I hear it from my neighbors every day. Some of the issues that are very important to them are increase in traffic, more schools to be built, decrease in air quality, to say nothing of upkeep on the parks, more police and fireman, and of course, the waste management. How can any of these concerns possibly be judged by a 6 year old WRSP EIR? Give the residence a current evaluation of the impact to our community.



Greg Cerlenko, COO  
Sacramento Habitat for Humanity, retired  
2032 Thornecroft Lane  
Roseville, CA 95747



Kristine Cerlenko  
AT&T, retired  
2032 Thornecroft Lane  
Roseville, CA 95747

December 11, 2011

City of Roseville – Planning Committee  
311 Vernon Street  
Roseville, CA 95678

Honorable Planning Commission Members:

RE: Fiddymment Farm Specific Plan Amendment (SPA-3)

We would like to submit our concerns over the SPA-3 SEIR currently pending consideration before your Commission. Although members of the WFFNA Planning Committee met with members from the developers and Roseville Planning Department on November 8, 2011, to discuss our concerns, and attended the public meeting on November 10, 2011, we still have strong concerns over the information provided in the SEIR. I would like to express some of those concerns at this time.

I. Specific Concerns over the SEIR

- 1) The baseline of the SEIR seems to vary throughout. In some areas the baseline used for comparatives is the previous 2004 EIR, then in other sections it appears to be the “current existing conditions of when the report was requested” in late 2010. And in at least one instance, it cannot be either. For example, in Table 5.6 re traffic impacts, the land use reflected shows 233 single family homes and 156 multi-family homes as a baseline. That obviously could not reflect the original WRSP EIR as there was no building at that time. Nor could it reflect the “current” conditions as there were well over double that number of homes here in late 2010.
- 2) Table 12.4 seems to be misleading as well. In the Climate Change category, the report reflects that “Build-out under WRSP” would have “increased impacts” while SPA 3 impacts would be “less than significant”. During our November 8<sup>th</sup> meeting, we specifically asked about the climate change issue—how can significantly more population have less impact than a lesser population. The response was that the new SEIR took into consideration new ecological improvements in building materials, etc. We then inquired if those same building conditions were used now (and why wouldn’t they be), wouldn’t the WRAP then be less significant than SPA 3, the response was yes. So it appears the report was comparing apples and oranges.

II. Density Concerns

- 1) The increasing overall density of this development continues to be high concern for WestPark – Fiddymment Farm residents. With each SPA submitted, the areas concerned have increased in overall density. We believe the truth to this is in the following information formulated from the Land Use Summary Chart Figure 3-2 of the SEIR.

Land Use Summary Chart:  
FIDDYMENT FARM - OVERALL DENSITY

Area	Units	Acres	Overall Density
Phase 1-South of Blue oaks	822	194.3	4.23
North of Blue Oaks / non- SPA 3 (after SPA 2)	1107	193.4	5.72
Entire SPA 3 area - Current	2271	536.95	4.23
Entire SPA 3 area – Proposed	<b>4176</b>	525.5	<b>7.95</b>

The proposed area of SPA 3 alone would then exceed the original number of units approved for the entire Fiddymment Farm development of 4170 units. SPA 3 represents an increase of 45% to the entire Fiddymment Farm development, all concentrated to the north of Blue Oaks.

SPA 3 EXTREME DENSITY

Area	Units	Acres	Overall Density
SPA 3 Phase 3 – Current	397	176.2	2.25
SPA 3 Phase 3 - Proposed	<b>1566</b>	182.83	<b>8.57</b>

**SPA 3 Phase 3 would be quadruple the density (400%) of that of the current WRSP build-out.**

Even if SPA 3 were built out at the current density of SPA 2 it would be:

$$525.5 \text{ acres} \times 5.72 \text{ units per acre (SPA 2 density)} = 3006 \text{ units [additional 735].}$$

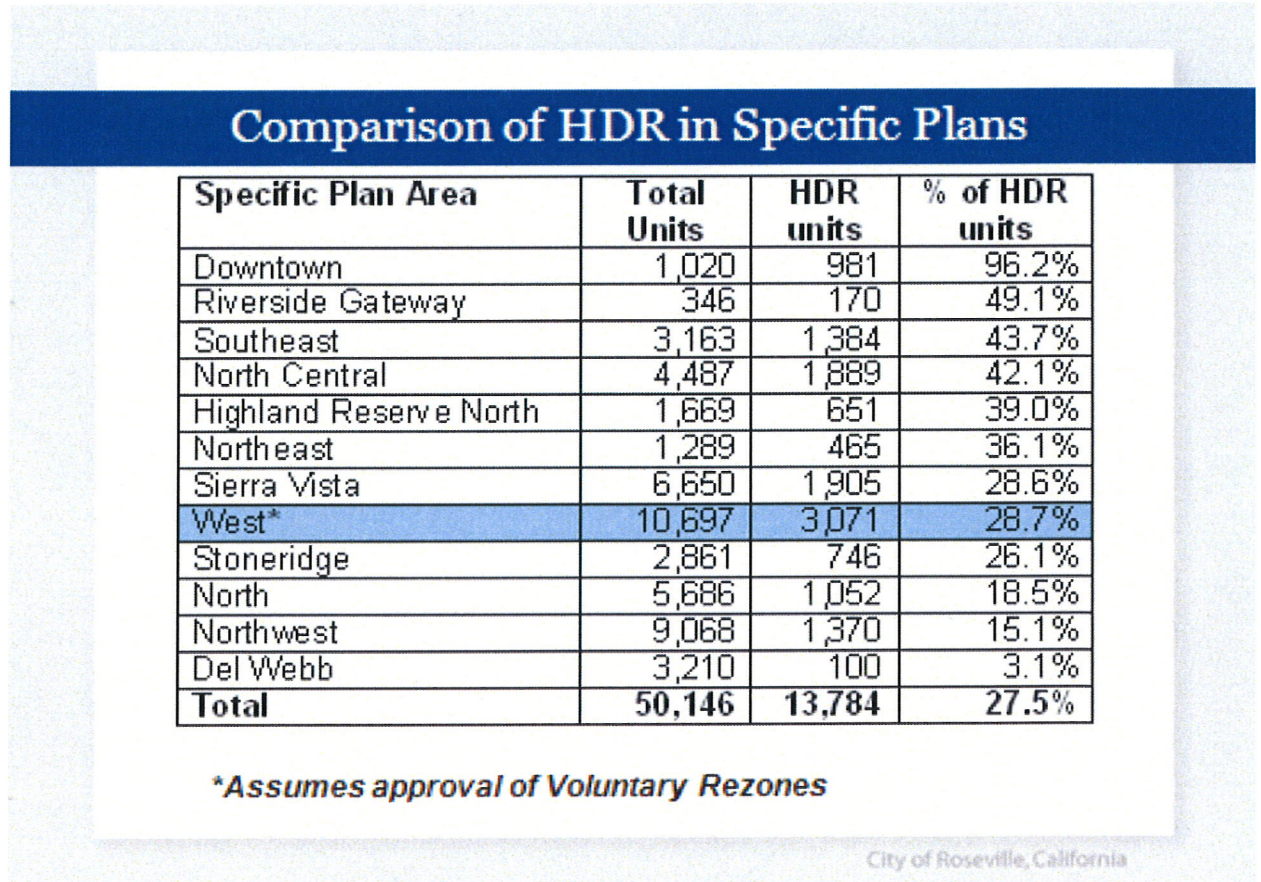
The real story of the density is in the SPA 3 Executive Summary pages 2-3 which shows the 6,112 proposed total units would now become:

Type	Existing Fiddymment Farm			Proposed SPA 3		
	Current %	Units	Avg. Density	SPA 3 %	Units	Avg. Density
LDR	67%	3067	4.23	53%	3,240	4.58
MDR	3%	131	7.4	12.1%	<b>740</b>	<b>10.87</b>
HDR	30%	7 facilities- up to 1410	20	34.9%	<b>9 facilities- up to 2,132</b>	<b>25</b>

This is a 14% decrease in LDR, 9.1% increase in MDR, and up to 722 more HDR units

- 2) High Density Residential (HDR) land use is of major concern to WestPark and Fiddymment Farm residents. The Roseville Planning Department, being aware of our concerns in this area, presented an HDR chart that was supposed to reflect the percentages of HDR in the City of Roseville. Unfortunately, it is quite misleading. It compares the supposed amounts of HDR in each specific plan against each other. Our concerns are the amount of HDR being built out in the West Roseville, and away from the more convenient locations of commerce, easy transit, and medical

provisions of town where HDR should be concentrated. This is a case of comparing apples and oranges again. The City's chart is:



In contrast to the City's chart, WFFNA provides the following version of those figures, which will show that the amount and percentage of HDR being loaded on the West Roseville area far exceeds that of other areas of the city.

(Please see chart on next page)

## Comparison of HDR in Specific Plans

The chart provided by the City Planning Department is very misleading. It compares the percentage number of HDR units within each area individually, not as a comparison to the total HDR within the City. Thus it is comparing 'apples and oranges'. The chart should be showing the comparisons of units among the City as a whole. With the correct figures, the chart would read as follows:

Specific Plan Area	HDR Units	% of HDR Units
West Roseville* (incl. SPA 3)	<b>3,071</b>	<b>22.3%</b>
Sierra Vista	1,905	13.8%
North Central	1,889	13.7%
Southeast	1,384	10%
Northwest	1,370	9.9%
North Roseville	1,052	7.6%
Downtown	981	7.1%
Stoneridge	746	5.4%
Highland Reserve North	651	4.7%
Northeast	465	3.3%
Riverside Gateway	170	1.2%
Del Webb	100	0.7%

WestPark - Fiddymment Farm Neighborhood Association

Overcrowding leads to serious social issues for traffic and parking, schools, and the environment of the entire area. This area is already gaining a considerable population, and will become even more impacted with the Sierra Vista and other developments starting in West Roseville.

### III. Conclusion

The homeowners of the WestPark and Fiddymment Farm homes should be seen as stakeholders in any major decisions made in this region. As such, our concerns should be given strong consideration in the matter of the Fiddymment Farm SPA 3 submission. We feel the issues raised will have a substantial impact, not only on the residents of WestPark and Fiddymment Farm, but in the overall well-being of the City of Roseville's future.

Sincerely submitted,

Loren Cook and Sue Hallahan-Cook  
 2697 Pipestone Loop  
 Roseville, CA 95747

City of Roseville –Planning Commission

311 Vernon Street

Roseville, CA 95678

Honorable Planning Commission Members:

We would like to submit our concerns over the SEIR currently pending consideration before your Commission.

SPA 3 is a new project and is deserving of a full EIR, not a supplement. We don't believe the six year old analysis is sufficient, namely the areas of "aesthetics" and "solid waste." It doesn't seem believable that a 45% increase in density has been adequately studied.

We want to know the full impact of SPA 3, not simply the incremental impact of SPA 3 on the hypothetical build-out of the WRSP.

We think there are significant impacts to traffic, air, noise, schools, parks, fire, police, sewer and water supply, that are not captured by a mere supplemental analysis. We believe that mitigation is, therefore, not adequately identified.

The SEIR's cumulative impact analysis is insufficient. For example, the following projects were not included in the cumulative impacts section of the SEIR: Sierra Vista, Curry Creek, Creekview, Placer Ranch, Placer County, etc.—all which will add an additional impact on this area.

The range of alternatives is inadequate and an arbitrary reduction of 20% density is not meaningful. The City needs to undertake a study to determine the best location for high density residential areas which we believe should be closer to main thoroughfares and employment centers, not isolated in West Roseville.

Overall, we are concerned with high density issues in general in our neighborhood and the high percentage of HDR in our area.

In closing, the homeowners of the WestPark and Fiddyment Farm homes should be seen as stakeholders in any major decisions made in this region. As such, our concerns should be given strong consideration in the matter of the Fiddyment Farm SPA 3 submission. We feel the issues raised will have a substantial impact, not only on the residents of WestPark and Fiddyment Farm, but in the overall well-being of the City of Roseville's future.

Sincerely submitted,

Marc Espinoza and Heidi Campbell

3290 Farleton Lane

Roseville, CA 95747

**From:** Rich Fabbre [<mailto:rfabbre@comcast.net>]  
**Sent:** Monday, December 12, 2011 3:30 PM  
**To:** [PlanningCommission@roseville.ca.us](mailto:PlanningCommission@roseville.ca.us); Plan Ext Email Dist List  
**Cc:** [rfabbre@comcast.net](mailto:rfabbre@comcast.net)  
**Subject:** Fiddymment Farm Specific Plan Amendment (SPA-3) SEIR

December 12, 2011

City of Roseville – Planning Commission and Planning Staff  
311 Vernon Street  
Roseville, CA 95678

Honorable Planning Commission Members:

RE: Fiddymment Farm Specific Plan Amendment (SPA-3) SEIR

I am very concerned about the adequacy and the validity of the conclusions drawn by the Subsequent Environmental Impact Report on Fiddymment Ranch Specific Plan Amendment 3.

Specifically, I am concerned that the magnitude of the SPA 3 change requires a new EIR and is not eligible for a subsequent EIR. The northern part of Fiddymment Farm, the area which is covered by SPA 3, will nearly double in density if SPA 3 is approved. The laws and regulations that require environmental impact studies did not envision a change this large being eligible for a Subsequent EIR. It should have a completely new one.

Second, the EIR does not account at all for the planned Curry Creek development. According to the city of Roseville's website, that development will include over 16,000 units. The writers of the EIR made a serious omission in not including that significant future population in their analysis of the impact that SPA 3 will have on the environment in West Roseville.

Third, I am concerned that the EIR does not use current conditions as the baseline as is required. Without a baseline condition, the subsequent analysis lacks meaning and validity.

Fourth, and most important to me, is the EIR's selection of the Environmentally Superior Alternative. There's an incredible amount words and data throughout the massive EIR document. However, when I boil it down, it seems to me that the only way the EIR writers were able to justify SPA 3 as being the Environmentally Superior Alternative was to base it on Climate Change. If one examines the other 11 areas, SPA 3 is never superior compared to the alternatives. But, the EIR concludes that SPA 3 is a better alternative when looking at the Climate Change area. On its face, this seems

incredible. How could the addition of 1905 of homes (about 5000 people) possibly have less impact on Climate Change than not crowding those 5000 people into the same land mass?

The logic---according to the EIR, on a per capita basis, apartments generate fewer emissions than single family homes. And, there will be a greater proportion of apartments in the northern part of Fiddymment Farm after SPA 3 than is currently planned. Therefore, there is likely (emphasis added) to be fewer emissions generated.

This is just not logical. Were there the same total number of units in SPA 3 as compared to currently planned and it was only a matter of increasing HDR and decreasing LDR, then this logic would probably be valid. However, there will be an additional 1905 units in SPA 3. Therefore, to make a conclusion on per capita evidence just does not make sense. I believe the EIR's conclusion that SPA 3 is the Environmentally Superior Alternative is grossly flawed and must be completely redone.

Thank You,

Rich Fabbre

**PHILIP L. HOSS  
2057 DEVONPORT LOOP  
ROSEVILLE, CA 95747**

City of Roseville – Planning Commission  
311 Vernon Street  
Roseville, CA 95678

Honorable Planning Commission Members:

RE: Fiddymment Farm Specific Plan Amendment (SPA-3)

I would like to submit my concerns over the SEIR currently pending consideration before your Commission.

- SPA 3 is a new project and is deserving of a full EIR, not a supplement. Add teeth to this by going through the list of issues which are not analyzed because the 6 year old analysis is deemed sufficient and question those, the two that come to mind right now are "aesthetics" and "solid waste". Call them on that. It isn't believable that a 45% increase in density has already been sufficiently analyzed in the 6 year old WRSP EIR.
- I think it is important to know the full impact of SPA 3, not simply the incremental impact of SPA 3 on the hypothetical build-out of the WRSP.
- There are significant impacts to traffic, air, noise, schools, parks, fire, police, sewer and water supply, that are not captured by a mere supplemental analysis. I believe that mitigation is, therefore, not adequately identified.
- The SEIR's cumulative impact analysis is insufficient and lists a specific project that the City knows about but was not included in the cumulative impacts section of the SEIR. Other projects include Sierra Vista, Curry Creek, Creekview, Placer Ranch, Placer County, etc.—all which shall add an additional impact on this area.
- The range of alternatives is inadequate and that an arbitrary reduction of 20% density is not meaningful. The City needs to undertake a study to determine the best location for high density residential areas which we believe should be closer to main thoroughfares and employment centers, not isolated in West Roseville.
- Density issues—overall of the entire neighborhood, and more specifically about the high percentage of HDR in our area.

The homeowners of the WestPark and Fiddymment Farm areas should be seen as stakeholders in any major decisions made in this region. As such, our concerns should be given strong consideration in the matter of the Fiddymment Farm SPA 3 submission. We feel the issues raised will have a substantial impact, not only on the residents of WestPark and Fiddymment Farm, but in the overall well-being of the City of Roseville's future.

Respectfully submitted,

Philip L. Hoss  
2057 Devonport Loop  
Roseville, CA 95747

City of Roseville – Planning Commission

311 Vernon Street

Roseville, CA 95678

Honorable Planning Commission Members:

RE: Fiddymment Farm Specific Plan Amendment (SPA-3)

I would like to submit my concern over the SEIR currently pending consideration before your Commission.

- SPA 3 is a new project and is deserving of a full EIR, not a supplement.

In particular the concern here is that the original six year old analysis does not seem sufficient in regards to "aesthetics" and "solid waste". A 45% increase in density requires a new study to ensure the city can handle the increased solid waste, without raising the garbage fees already charged to those living in Roseville. In this era of hard times, the City keeps raising the taxes/fees for garbage and water.

- I want to know the full impact of SPA 3, not simply the incremental impact of SPA 3 on the hypothetical build-out of the WRSP. Why build more housing when the existing housing market even in the City is already depressed. The market has too many houses on the market as it is why add to this and depress prices further?

- I think there are significant impacts to traffic, air, noise, schools, parks, fire, police, sewer and water supply, that are not captured by a mere supplemental analysis. I believe that mitigation is, therefore, not adequately identified.

- The SEIR's cumulative impact analysis is insufficient and list a specific project that the City knows about but was not included in the cumulative impacts section of the SEIR. Other projects include Sierra Vista, Curry Creek, Creekview, Placer Ranch, Placer County, etc.—all which will add an additional impact on this area.

- The range of alternatives is inadequate and that an arbitrary reduction of 20% density is not meaningful. The City needs to undertake a study to determine the best location for high density residential areas that I believe should be closer to main thoroughfares such as Roseville Parkway and employment centers, not isolated in West Roseville.

I have lived in the City of Roseville since 1996. STOP THE GROWTH AND CONTINUED HOUSING EXPANSION, enough is enough already. Stop the madness and take an example from the City of Davis that limits growth.

Sincerely submitted,

Harpaul Nagra

Fiddymment Neighbor

December 11, 2011

City of Roseville – Planning Commission  
311 Vernon Street  
Roseville, CA 95678

Honorable Planning Commission Members:

RE: Fiddyment Farm Specific Plan Amendment (SPA-3)

We would like to submit my concerns over the SEIR currently pending consideration before your Commission.

SPA 3 is a new project and is deserving of a full EIR, not a supplement. The old analysis that is being used is 6 years old. The 45% increase in density which SPA 3 proposes is not part of the WRSP EIR.

- We want to know the full impact of SPA 3, not simply the incremental impact of SPA 3 on the hypothetical build-out of the WRSP.
- We think there are significant impacts to traffic, air, noise, schools, parks, fire, police, sewer and water supply, that are not captured by a mere supplemental analysis. We believe that mitigation is, therefore, not adequately identified.
- The SEIR's cumulative impact analysis is insufficient. There are other project that are not included in the cumulative impacts section of the SEIR that will add an additional impact on this area specifically Sierra Vista, Curry Creek, Creekview, and Placer Ranch.
- The range of alternatives is inadequate and that an arbitrary reduction of 20% density is not meaningful. The City needs to undertake a study to determine the best location for high density residential areas which we believe should be closer to main thoroughfares and employment centers, not isolated in West Roseville.
- Density issues—overall of the entire neighborhood, and more specifically about the high percentage of HDR in our area.


In closing, you could express some unity as a homeowner, the homeowners of the WestPark and Fiddyment Farm homes should be seen as stakeholders in any major decisions made in this region. As such, our concerns should be given strong consideration in the matter of the Fiddyment Farm SPA 3 submission. We feel the issues raised will have a substantial impact, not only on the residents of WestPark and Fiddyment Farm, but in the overall well-being of the City of Roseville's future.

I have resided in this area now for 3yrs and within that short timeframe have seen quite a bit of change which have been for the worse. Please don't create more problems in a community that was originally to be a haven that we call home.

Sincerely,



Theresa Olivares



Chris Bailey

2101 Greatfield Drive, Roseville, CA 95747

## Draft Letter Sample

City of Roseville – Planning Commission  
311 Vernon Street  
Roseville, CA 95678

Honorable Planning Commission Members:

RE: Fiddymment Farm Specific Plan Amendment (SPA-3)

We would like to submit our concerns over the SEIR currently pending consideration before your Commission.

We bought our home in WestPark in April 2007 and in that short time span, significant changes to our residential area have been proposed several times. We are not opposed to all planning changes in the area, but we are opposed to SPA-3 and ask you to reconsider your position.

We do not believe that significant analysis of the impacts SPA-3 would create has been conducted. We also believe that a full Environmental Impact Report is required and that the six-year-old EIR isn't sufficient. We are confident that considerations to solid waste and aesthetics have not been fully considered and we further believe that the changes proposed in SPA-3 would impact both greatly.

We remain extremely concerned with any proposal that dramatically increases the high density housing, as SPA-3 proposes to do. Though we are aware of financial pressures placed on land developers to turn a profit, we don't believe that their desire for profitable gain should come at the expense of the quality of life of WestPark and Fiddymment Farms' current residents. With the minimal high-density housing that already exists in the area, we have seen an increase in vandalism and attempted burglaries, as well as an enormous increase in the number of drivers speeding and ignoring traffic signs on Hayden Parkway.

The homeowners of the WestPark and Fiddymment Farm homes should be seen as stakeholders in any major decisions made in this region. As such, our concerns should be given strong consideration in the matter of the Fiddymment Farm SPA 3 submission. We feel the issues raised will have a substantial impact, not only on the residents of WestPark and Fiddymment Farm, but in the overall well-being of the City of Roseville's future.

Sincerely submitted,

Monte and Anissa Routon  
101 Allimore Court  
Roseville, CA 95747

City of Roseville – Planning Commission  
311 Vernon Street  
Roseville, CA 95678

Honorable Planning Commission Members:

RE: Fiddymment Farm Specific Plan Amendment (SPA-3)

I would like to submit my concerns over the SEIR currently pending consideration before your Commission.

- SPA 3 is a new project and is deserving of a full EIR, not a supplement. It don't believe that a 45% increase in density has already been sufficiently analyzed in the 6 year old WRSP EIR.
- I want to know the full impact of SPA 3, not simply the incremental impact of SPA 3 on the hypothetical build-out of the WRSP.
- I think there are significant impacts to traffic, air, noise, schools, parks, fire, police, sewer and water supply, that are not captured by a mere supplemental analysis. I believe that mitigation is, therefore, not adequately identified.
- The SEIR's cumulative impact analysis is insufficient. Other projects such as Sierra Vista, Curry Creek, Creekview, Placer Ranch, Placer County, etc.—will all add an additional impact on this area and must be included the impact analysis.
- The range of alternatives is inadequate and an arbitrary reduction of 20% density is not meaningful. The City needs to undertake a study to determine the best location for high density residential areas which I believe should be closer to main thoroughfares and employment centers, not isolated in West Roseville.

The homeowners of the WestPark and Fiddymment Farm homes should be seen as stakeholders in any major decisions made in this region. As such, our concerns should be given strong consideration in the matter of the Fiddymment Farm SPA 3 submission. We feel the issues raised will have a substantial impact, not only on the residents of WestPark and Fiddymment Farm, but in the overall well-being of the City of roseville's future.

Sincerely submitted,

Tom Stevens  
2025 Cove Lane  
Roseville, CA 95747

December 8th, 2011

City of Roseville – Planning Committee  
311 Vernon Street  
Roseville, CA 95678

Honorable Planning Commission Members:

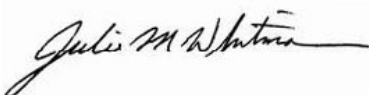
RE: Fiddymment Farm Specific Plan Amendment (SPA-3) & the SEIR

My husband and I, and our two children, moved into Fiddymment Farms three years ago. We are extremely concerned about the SEIR that is currently under consideration by your Commission. Please take the following comments into account before coming to a final disposition on this matter:

- SPA 3 is actually a new project, which should merit a full EIR instead of a supplement. SPA 3 would include a 45% density increase, which is substantial. Additionally, the WRSP EIR (approved in 2004) is seven years old, and therefore the SEIR comparisons cannot meet the CEQU guidelines. Decision-makers, who are supposed to take the public's input into account, simply cannot determine all of the potential impact of SPA 3 through the supplemental analysis. A full and comprehensive EIR should be required in this case.
- We and our neighbors want to know the full impact of SPA 3, not simply the incremental impact of SPA 3 on the hypothetical build-out of the WRSP.
- We believe that there will be significant impacts to traffic, air, noise, schools, parks, fire, police, sewer and water supply, that are not captured by a supplemental analysis. Mitigation is, therefore, not adequately identified.
- We chose to live in the WestPark/Fiddymment Farms neighborhood based on the density proposed in initial plans. We would have purchased a home elsewhere if we had anticipated such a great increase in density in this area (with the proposed HDR in the west Roseville Specific Plan already almost double that of any other existing area!). The city should stand by original proposals which drew so many to this area.
- High density residential areas should ideally be positioned closer to main thoroughfares, employment centers, grocery stores, etc. West Roseville does not fit this description, and therefore should not be the proposed position for such a focused region of HDR homes.
- The SEIR's cumulative impact analysis is insufficient, and did not include the impact of other projects such as Creekview, Placer Ranch, Sierra Vista, etc. The cumulative impact on West Roseville will most likely be substantial. This error of omission is significant and shortsighted.
- The decision makers in the city and all of the residents have a right to fully understand the full impact of the proposed developments and changes to original plan to understand implications in the residents' immediate lives and those of our children. Short-cutting the process without a full EIR does not do anyone any good. This SEIR needs to be rejected, and a full EIR should be completed.

All of the residents of WestPark and Fiddymment Farm homes should be seen as essential and primary stakeholders in any major decisions made that impact this region, our homes, and our families. Our concerns should be given strong consideration and top priority in the matter of the Fiddymment Farm SPA 3 submission. The issues raised will have a substantial impact, not only on the residents of WestPark and Fiddymment Farm, but in the overall well-being of the City of Roseville.

Sincerely,



Julie Whitman  
125 Waterlily Ct, Roseville (Fiddymment Farms)