APPENDIX B

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COMMUNITY ASSOCIATION

P.O. Box 1459

Folsom, CA 95763-1459

NOV 2 9 2005

November 25, 2005

City of Rocklin Community Development Department 3970 Rocklin Road Rocklin, CA 95677

Dear Mr. Mohlenbrok:

This letter concerns the Clover Valley Large and Small Lot Project. I am writing on behalf of the Whitney Oaks Community Association and Board of Directors. As you know, Whitney Oaks is a community of 1877 homes in northeast Rocklin adjacent to the proposed project.

As proposed, this project will greatly increase traffic patterns throughout our community. We are concerned that increased noise, air pollution, traffic congestion and speed on our streets will adversely affect the quality of life in our community and the safety of our residents.

Park Drive has a posted speed limit of 40 miles per hour. As I am certain that your police and traffic departments can attest, speeds in excess of 50 miles per hour are not uncommon on Park Drive, especially coming down the hilly terrain in both directions from the proposed intersection at Park with the new Valley View Parkway connector route to Sierra College boulevard. We are concerned about the safety of our residents entering Park Drive from the entrances onto Park from the several Springfield gates, Whitney Oaks Drive, Live Oak Lane, Black Oak Drive and Hillcrest Road. We are also very concerned about the safety of our children going to and from school at both Granite Oaks Middle School, at the comer of Park Drive and Wyckford Boulevard, and Valley View Elementary School on Crest Drive.

We realize that our comments are after the deadline for the comment period. However, we request that they be considered as the project review moves forward. If you have any questions or require more information, please let us know.

Sincerely.

Garth Tanner, President

Whitney Oaks Community Association

California Regional Water Quality Control Board

Central Valley Region

Robert Schneider, Chair

Sacramento Main Office

11020 Sun Center Drive #200, Rancho Cordova, California 95670-6114
Phone (916) 464-3291 • FAX (916) 464-4645
http://www.waterboards.ca.gov/centralvalley

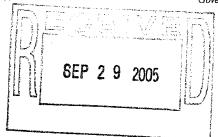
Arnold Schwarzenegger Governor

22 September 2005

Alan C. Lloyd, Ph.D.

Agency Secretary

David Mohlenbrok City of Rocklin 3970 Rocklin Road Rocklin, CA 95677



PROPOSED PROJECT REVIEW, CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA), NOTICE OF PREPARATION FOR CLOVER VALLEY LARGE AND SMALL LOT TENTATIVE SUBDIVISION MAP, STATE CLEARINGHOUSE #1993122077, ROCKLIN, PLACER COUNTY

As a Responsible Agency, as defined by CEQA, we have reviewed the Notice of Preparation for Clover Valley Large and Small Lot Tentative Subdivision Map. Based on our review, we have the following comments regarding the proposed project.

Construction Storm Water

A NPDES General Permit for Storm Water Discharges Associated with Construction Activities, NPDES No. CAS000002, Order No. 99-08-DWQ is required when a site involves clearing, grading, disturbances to the ground, such as stockpiling, or excavation that results in soil disturbances of one acre or more of total land area. Construction activity that involves soil disturbances on construction sites of less than one acres and is part of a larger common plan of development or sale, also requires permit coverage. Coverage under the General Permit must be obtained prior to construction. More information may be found at http://www.swrcb.ca.gov/stormwtr/construction.html

Post-Construction Storm Water Management

Manage storm water to retain the natural flow regime and water quality, including not altering baseline flows in receiving waters, not allowing untreated discharges to occur into existing aquatic resources, not using aquatic resources for detention or transport of flows above current hydrology, duration, and frequency. All storm water flows generated on-site during and after construction and entering surface waters should be pre-treated to reduce oil, sediment, and other contaminants. The local municipality where the proposed project is located may now require post construction storm water Best Management Practices (BMPs) pursuant to the Phase II, SWRCB, Water Quality Order No. 2003 – 0005 – DWQ, NPDES General Permit No. CAS000004, WDRS for Storm Water Discharges from Small Municipal Separate Storm Sewers Systems (MS4). The local municipality may require long-term post-construction BMPs to be incorporated into development and significant redevelopment projects to protect water quality and control runoff flow.

California Environmental Protection Agency

Wetlands and/or stream course alteration

Section 401 of the federal Clean Water Act requires any project that impacts waters of the United States (such as streams and wetlands) to file a 401 Water Quality Certification application with this office. The project proponent must certify the project will not violate state water quality standards. Projects include, but are not limited to, stream crossings, modification of stream banks or stream courses, and the filling or modification of wetlands. If a U.S. Army Corp of Engineers (ACOE) permit is required for the project, then Water Quality Certification must be obtained prior to initiation of project activities. The proponent must follow the ACOE 404(b)(1) Guidance to assure approval of their 401 Water Quality Certification application. The guidelines are as follows:

- 1. **Avoidance** (Is the project the least environmentally damaging *practicable* alternative?)
- 2. **Minimization** (Does the project minimize any adverse effects to the impacted wetlands?)
- 3. **Mitigation** (Does the project mitigate to assure a no net loss of functional values?)

If, after avoidance and minimization guidelines are considered and wetland impacts are still anticipated:

- determine functional losses and gains (both permanent and temporal; both direct and indirect)
- conduct adequate baselines of wetland functions including vegetation, wildlife, hydrology, soils, and water quality
- attempt to create/restore the same wetland type that is impacted, in the same watershed
- work with a regional context to maximize benefits for native fish, wildlife, vegetation, as well as for water quality, and hydrology
- use native species and materials whenever possible
- document all efforts made to avoid the minimize adverse wetland impacts
- be prepared to develop performance criteria and to track those for between 5 to 20 years
- be prepared to show project success based on achieving wetland functions
- if the project fails, be prepared to repeat the same process (via financial assurance), with additional acreage added for temporal losses
- specify how the mitigation project will be maintained in perpetuity and who will be responsible for the maintenance

For more information regarding Water Quality Certification may be found at http://www.waterboards.ca.gov/centralvalley/available_documents/wq_cert/application.pdf

Dewatering Permit

The proponent may be required to file a Dewatering Permit covered under Waste Discharge Requirements General Order for Dewatering and Other Low Threat Discharges to Surface Waters Permit, Order No. 5-00-175 (NPDES CAG995001) provided they do not contain significant quantities of pollutants and are either (1) four months or less in duration, or (2) the average dry weather discharge does not exceed 0.25 mgd:

- a. Well development water
- b. Construction dewatering
- c. Pump/well testing
- d. Pipeline/tank pressure testing
- e. Pipeline/tank flushing or dewatering
- f. Condensate discharges
- g. Water Supply system discharges
- h. Miscellaneous dewatering/low threat discharges

Industrial

A NPDES General Permit for Storm Water Discharges Associated with Industrial Activities, NPDES No. CAS000001, Order No. 97-03-DWQ regulates 10 broad categories of industrial activities. The General Industrial Permit requires the implementation of management measures that will achieve the performance standard of best available technology economically achievable (BAT) and best conventional pollutant control technology (BCT). The General Industrial Permit also requires the development of a Storm Water Pollution Prevention Plan (SWPPP) and a monitoring plan. The General Industrial Permit requires that an annual report be submitted each July 1. More information may be found at http://www.swrcb.ca.gov/stormwtr/industrial.html

For more information, please visit the Regional Boards website at http://www.waterboards.ca.gov/centralvalley/ or contact me at 916.464.4683 or by e-mail at berchtd@waterboards.ca.gov.

DANNAS J. BERCHTOLD

Storm Water Unit 916.464.4683

cc: State Clearinghouse, Sacramento

California Regional Water Quality Control Board

Central Valley Region

Robert Schneider, Chair

Sacramento Main Office

11020 Sun Center Drive #200, Rancho Cordova, California 95670-6114
Phone (916) 464-3291 • FAX (916) 464-4645
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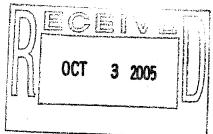
Arnold Schwarzenegger Governor

27 September 2005

Alan C. Lloyd, Ph.D.

Agency Secretary

David Mohlenbrok City of Rocklin Community Development Department 3970 Rocklin Road Rocklin, CA 95677



PROPOSED PROJECT REVIEW, CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA), NOTICE OF PREPARATION FOR CLOVER VALLEY, ROCKLIN, PLACER COUNTY

As a Responsible Agency, as defined by CEQA, we have reviewed the Notice of Preparation for Clover Valley. Based on our review, we have the following comments regarding the proposed project.

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- d. Pipeline/tank pressure testing
- e. Pipeline/tank flushing or dewatering
- f. Condensate discharges
- g. Water Supply system discharges
- h. Miscellaneous dewatering/low threat discharges

For more information, please visit the Regional Boards website at http://www.waterboards.ca.gov/centralvalley/ or contact me at 916.464.4683 or by e-mail at berchtd@waterboards.ca.gov.

DANNAS J. BERCHTOLD

Storm Water Unit 916.464.4683

cc: City of Rocklin



Planning Department

311 Vernon Street Roseville, California 95678-2649

October 3, 2005

Ms. Cheryl Hoffman 5508 Butte View Court Rocklin, CA 95765

Dear Ms. Hoffman

RE: Clover Valley Project

The City of Roseville received your letter dated September 19, 2005 regarding the environmental impacts from development related to the proposed Clover Valley project located in the City of Rocklin. We appreciate the information you provided to us, however, because the project is in the City of Rocklin I wasn't sure if you intended to copy the City of Roseville with your letter, or if it was inadvertently sent to us by mistake. Therefore, I am forwarding a copy of your letter to Rocklin just in case they did not receive a copy.

For your information, the City of Roseville did recently receive a copy of a Notice of Preparation that indicates that the City of Rocklin will prepare a new environmental impact report (EIR).

If you have any questions related to the City of Roseville feel free to contact me at (916) 774-5276.

Sincerely.

Kathy Pease Senior Planner

C: Sherri Abbas, Planning Service Manager, City of Rocklin

To Parity Ser Wills!

Abow Elected Ufficial and Newsier Maken, According to a recent article in the Business Journal the developers of Clover Vally (Places Co.), northory plan to displace 16 million Choic yards of soil and make cods of up to 60 feet into b The Slopes Detween Park Drive and Siche College Book (Rocklin). Are they in Samo? Gond one of the main known that homes and lots in the Rochein/Tooms/Lincoln area command such high finces is the bready of the relaining footbill, gateway to the Suna Normadas? Dies conother housen the worderful all growth take frees that cover there holes? And yet their plan is to remove too 252 of the skisting trees to binle (curatry) 558 Custom hors! ... because, Got knows, Places County. and purhicularly Rockin/Lincoln, need more home! Jakea look at Sun City Function Hells - look and the development in and created Twelve Budges. Do we really reled more homes? Where development? More traffic. We meet to start piesewary open space (and not just green belts and token parks). Cc: council, mgr, Atty /28/10

> SEP 2 9 2005 CITY MANAGER

We need to present what's last of the Maide and Minch heintage. We not to stop Plannie rape of this beautiful country side. Alase consider an environmental Study of Air development and the impact it will have in the trees, the will life and the country side. We Cannot get these resources back when developers fave one theme new homes, more traffice, lies gulity of Oute Estworth of?

Please consider all'aspects Defore approving

Almo project.

Chigh Haffman 5508 Buth View Cour Rocker CA 95765 (916) 315.0535

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COUNTY OF PLACER COMMUNITY DEVELOPMENT / RESOURCE AGENCY

FACSIMILE COVER SHEET							
DATE:	10/14/05						
TIME:	3:20 pm	_					
RECEIVING TELEPHONE NUMBER:	916-625-5	5195					
TO:	David Mohlenbrok, City of Rocklin						
FROM:	Rebecca Maddex (Fg)						
SUBJECT:	Comments on NOP for Recirculated EIR						
ORIGINAL COPY TO FOLLOW:	⊠ Yes	□No					
TOTAL NUMBER OF SHEETS INCLUDING COVER SHEET:	3						
IF YOU HAVE ANY QUESTIONS, PLEASE CALL:	(530)	889-7538					
COMMENTS:							



COMMUNITY DEVELOPMENT / RESOURCE AGENCY

Planning . Engineering and Surveying . Building

October 14, 2005

David Mohlenbrok Community Development Department City of Rocklin 3970 Rocklin Road Rocklin, CA 95677

SUBJECT: CLOVER VALLEY SUBDIVISION; NOTICE OF PREPARATION;

RECIRCULATED ENVIRONMENTAL IMPACT REPORT; CITY OF

ROCKLIN

Dear Mr. Mohlenbrok,

The Clover Valley Subdivision project includes dividing a 622-acre site into 33 large lots. The proposed small lot tentative map would potentially subdivide the large lots further; a total of 558 single-family residential lots would be created. The proposed action is a Recirculated EIR to address the added small lot tentative map entitlement and other changes made as a result of specific concerns that were raised during the last public review period of the EIR.

Placer County Engineering and Surveying Division of the Community Development / Resource Agency has reviewed the above-cited document and would like to provide the following comments:

- 1. Placer County previously commented on the NOP for this project in a letter dated November 30, 2004. Also, the Transportation Planning Division of the Department of Public Works commented on this revised NOP in a letter dated September 29, 2005. These two letters are incorporated into the comments for this NOP review by reference and the comments are still applicable.
- 2. Figure 2 should be revised to indicate the correct location of the City and County limits in relation to the project boundaries. Will the City of Rocklin consider annexation of the segment of Sierra College Boulevard at the intersection of Delmar Avenue and Sierra College Boulevard as part of, or concurrent with, this project?
- 3. Is the 50-foot creek setback large enough to act as a protective buffer between developed areas and the creek? Page 4 indicates that this setback will be encroached in two locations. We are concerned about the water quality impacts of new development to creeks within the County. A discussion of the water

Mr. David Mohlenbrok

RE: CLOVER VALLEY RECIRCULATED NOP

October 14, 2005

Page 2 of 2

quality impacts to creeks and drainage ways within the project area should be included in the EIR, including identification of the potential contaminants being introduced (temperature, turbidity, nutrients, fertilizers, petroleum products, etc.) by the proposed residential subdivisions and how these impacts will be addressed or mitigated to less than significant levels.

4. Is blasting required as part of construction of Valley View Parkway? If so, will requirements of the County Sheriff's Department for blasting operations be met? What is the approved method of disposal of excess material, if required? The EIR should discuss an option for hauling extra fill material offsite and analyze any environmental impacts of this portion of the project, if there is the likelihood that it may be required.

Thank you for the opportunity to comment on this document. If you have any questions, please contact me at (530) 889-7538.

Sincerely,

Rebecca Maddex

Associate Civil Engineer, P.E.

Engineering and Surveying Division

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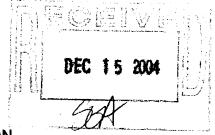


PLACER COUNTY DEPARTMENT OF PUBLIC WORKS

Tim Hackworth, Director Ken Grehm, Assistant Director Rick Dondro, Deputy Director Wes Zicker, Deputy Director

November 30, 2004

Sherri Abbas, Planning Services Manager Community Development Department City of Rocklin 3970 Rocklin Road Rocklin, CA 95677



SUBJECT:

CLOVER VALLEY SUBDIVISION

LARGE LOT TENTATIVE SUBDIVISION MAP (SD-98-05) SMALL LOT TENTATIVE SUBDIVISION MAP (SD-2004-03) OAK TREE PRESERVATION PLAN PERMIT (TRE-2004-26)

GENERAL PLAN AMENDMENT (GPA-2004-01)

GENERAL DEVELOPMENT PLAN AMENDMENT (PDG-2004-01)

ROCKLIN 650 INVESTORS c/o GERRY KAMILOS

The Clover Valley Subdivision project includes dividing a 622-acre site into 41 residential villages, a neighborhood commercial site, two neighborhood park sites, a future fire station site, 13 open space parcels, and major streets. A total of 689 single-family residential lots would be created. The proposed action is a Recirculated EIR to address the current expanded application and specific concerns that were raised during the public review period of the 2002 EIR for the proposed Clover Valley large lot tentative subdivision.

Placer County Department of Public Works has reviewed the above-cited document and would like to provide the following comments:

- The traffic analysis prepared as a part of this EIR should examine the potential impacts of the project on Sierra College Boulevard between the Town of Loomis and SR 193. The following intersections should be specifically analyzed in the traffic study:
 - a. Del Mar Avenue/Sierra College Boulevard
 - b. English Colony Road/Sierra College Boulevard
 - c. Twelve Bridges Road/Sierra College Boulevard
 - d. Sierra College Boulevard/SR 193
- 2. Roadway frontage improvements and/or right-of-way dedication, consistent with the SCR 93 or Highway Deficiency Manual, shall be as follows:
 - a) ½ of a 70' wide roadway where the project fronts Sierra College Boulevard

Letter to Sherri Abbas Re: Clover Valley Subdivision November 30, 2004 Page 2

> The roadway shall be designed and constructed to a T.I. of 10.0 and a design speed of 55 mph. A class II bike lane shall also be required along the project roadway frontage.

- b) ½ of an 84' wide Highway Easement were the project fronts Sierra College Boulevard.
- 3. Any public road entrance/driveway onto a County road shall be constructed to a Plate 27-1, LDM standard. The improvements shall begin at the outside edge of any future lane(s) as directed by the Placer County DPW. An Encroachment Permit shall be obtained by the applicant or authorized agent from Placer County DPW.
- 4. The project shall collect and treat all residential and commercial stormwater runoff on-site prior to discharging to any Placer County storm drainage system, if applicable.

Thank you for the opportunity to comment on this document. If you have any questions, please contact me at (530) 889-7538.

Sincerely

COUNTY OF PLACER DEPARTMENT OF PUBLIC WORKS T. D. HACKWORTH, DIRECTOR

REBECCA BOND, P.E.

elicia

ASSOCIATE CIVIL ENGINEER

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PLACER COUNTY DEPARTMENT OF PUBLIC WORKS

Tim Hackworth, Director Ken Grehm, Assistant Director Rick Dondro. Deputy Director

September 29, 2005

Ms. Sherri Abbas City of Rocklin Planning Department 3970 Rocklin Road Rocklin, CA 95677

RE:

Clover Valley Notice Of Preparation

Dear Ms. Abbas:

Placer County Department of Public Works appreciates the opportunity to provide comments on the above-referenced project and offers the following for your consideration.

The proposed development within the City of Rocklin will have traffic impacts on Placer County area roadway network. The Environmental Impact Report for this project should analyze the traffic impacts on Sierra College Blvd from the project entrance to the Town of Loomis to include the roadway segment and the intersection Delmar Ave/Sierra College Blvd within these limits.

If there are any questions please give me a call at (530) 889-7533.

Sincerely,

COUNTY OF PLACER

DEPARTMENT OF PUBLIC WORKS

Richard Moorehead, P.E.

Associate Engineer

Sherri Abbas

From: Dana C Wiyninger [dcwiynin@placer.ca.gov]
Sent: Wednesday, October 12, 2005 4:33 PM

To: Sherri Abbas Cc: Sherri Abbas

Subject: Clover Valley Recirculated EIR NOP- City of Rocklin

Attachments: Dana C Wiyninger.vcf



Dana C Viyninger.vcf (505 B

Mr. David Mohlenbrok (c/o Sherri Abbas- City of Rocklin Planning)-

Placer County Environmental Health Services is in receipt of the Notice of Preparation for the Clover Valley recirculated EIR. (This project proposes 558 single family residential lots and associated neighborhood commercial uses on 622 acres. The project parcels consist of Assessor Parcel Numbers: 030-010-010, 030-010-011, 030-020-003, 030-030-059, 030-041-001, 030-050-013, 030-070-016, 030-070-017, 032-010-021, 032-060-065, 032-070-066, and 032-070-067.) While we usually do not have the staff time to comment on City projects, we are providing general comments for the Clover Valley project, given it's size.

As a responsible agency, Environmental Health Services has reviewed the above referenced Notice of Preparation. For our areas of concern, the significant environmental issues and reasonable alternatives and mitigation measures that will need to be explored in the draft EIR, and that are not specifically included in the NOP are as follows:

HAZARDS

- 1) The discussion concerning mosquito abatement and related mitigation measures is appropriate. Project waterways, basins, and detention/retention structures should be reviewed by the Placer Mosquito Abatement District (www.placermosquito.org).
- 2) This project is proposing a change of use to more sensitive residential uses. The effects of past mining activities on the project is briefly touched upon in the NOP; however, there is no mention of other past property uses that might have remaining health or environmental hazards. The effects of other relevant past uses should be included, if applicable. We have observed many projects in the County on land with past agricultural, mining, or other commercial uses from over 50 years ago, that have significant and persistent chemical contamination or other hazards.

General Discussion: we would recommend at a minimum the performance and evaluation of a current Phase 1 Environmental Site Assessment (ESA) performed to ASTM Standard E 1527 for the EIR and Large Lot Tentative Subdivision Map. (ESAs are to be performed to the property's first developed use, or to 1940, whichever is earlier.) If intensive commercial activities are discovered as part of the ESA, then further study is warranted, either as part of the EIR, or as detailed mitigation measures for the Small Lot Tentative Subdivision Map. (Intensive commercial activities can include animal husbandry dipping stations, farm animal carcass burial pits, concentrated manure disposal areas, commercial orchards, pesticide/herbicide mixing areas or buildings, and mines).

For past agricultural uses, this further study would consist of a limited Phase 2 Soils Investigation, performed in accordance with California EPA, Department of Toxic Substances Control (DTSC) August

2002 "Interim Guidance for Sampling Agricultural Fields for School Sites", available at: http://www.dtsc.ca.gov/PublicationsForms/interim-ag-soils-guidance.pdf .

The discussion in the soils investigation report should reference the current US EPA Preliminary Remediation Goals (with California revisions) for risk levels. These can be found at:

http://www.epa.gov/region09/waste/sfund/prg/ . Review of this limited soils testing may lead to a Preliminary Endangerment Assessment, or equivalent "no further action" letter, from state DTSC. (This includes their environmental and health risk assessment.)

For past mining uses, this further investigation would consist of an Abandoned Mine Lands Assessment performed to the DTSC protocol. (For information see: http://www.dtsc.ca.gov/SiteCleanup/FS_SMP_MINE.pdf) This assessment by DTSC would address both physical and chemical hazards.

Past uses hazards mitigation measures in the EIR could include one or more of the above studies, and these possible other measures as required by DTSC:

Removal of contaminants
Encapsulation of contaminants
Deed restrictions on use of contaminated areas
Securing physical hazards

HYDROLOGY & WATER QUALITY

Please include a discussion of the disposition of the project parcel's existing water wells and onsite sewage disposal systems. This could be easily added to the "proposed project's impact to groundwater in Rocklin" bullet item.

General Discussion: proper destruction of water wells and onsite sewage disposal systems under permit are standard groundwater quality mitigation measures.

Please contact me using the information below if you have any questions or concerns. Thank you,

Dana Wiyninger
Land Use Technical Specialist
Placer County Environmental Health Div.
11454 B Avenue, Auburn, CA 95603
(530) 745-2366
(530) 745-2370 main #
(530) 745-2370 fax
dcwiynin@placer.ca.gov

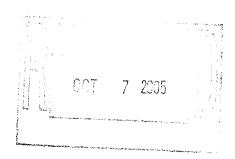


PLACER COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

Tim Hackworth, Executive Director Brian Keating, District Engineer Andrew Darrow, Development Coordinator

October 4, 2005

David Mohlenbrok Community Development Department City of Rocklin 3970 Rocklin Road Rocklin, CA 95677



RE: Clover Valley Subdivision / NOP of Recirculated EIR

Dear David:

We have the Notice of Preparation for a Recirculated Environmental Impact Report for the subject project and have the following comments.

Per the project's Drainage Study dated February 20, 2001, the applicant is proposing to provide mitigation of 2- through 100-year peak flows at both the subject project's downstream property line and at Clover Valley Creek's confluence with the main stem of Dry Creek. Have the project's applicant provide supporting documentation that this mitigation measure is still being provided.

We request that future environmental documents be submitted for our review when they become available. Please call me at (530) 889-7541 if you have any questions regarding these comments.

Andrew Darrow, P.E.

Development Coordinator

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Placer Mosquito Abatement District

Lincoln • Loomis • Rocklin • Roseville • Placer County at Large

DATE: September 26, 2005

TO: David Mohlenbrok

CITY: Rocklin

PROJECT #: Clover Valley Recirculated Environmental Impact Report

RE: Comments from the Placer Mosquito Abatement District

RESPONSE FROM DISTRICT:

To reduce the potential for mosquito production in this development, the District recommends the following measures:

- □ Detention basins and other flood-control structures should empty within 72 hours following a storm event.
- Minimize nuisance water runoff by using drip irrigation for landscaping, properly adjusting sprinklers to prevent runoff water, and landscape with drought-tolerant plants that require minimal watering.
- Provide a long-term management plan with adequate funding for the regular removal of emergent vegetation (cattails and similar plants) and accumulated silt and debris from ditches, re- and detention basins, and other waterways.
- ☐ Clearly designate what agency(s) or organization(s) is responsible for the maintenance of ditches, re- and detention basins, community spaces, open spaces, wetlands, and other waterways.
- □ Provide and maintain access for District personnel to inspect and when necessary treat ditches, re- and detention basins, wetlands, and other waterways.

Jamesina J. Scott, Ph.D.

Vector Ecologist

Cc: Harlin Smith, Trustee, Placer MAD. all hyperbolic management of the control of the property of the control of the control

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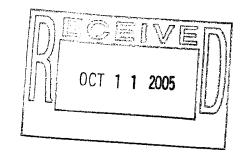


Placer County Office of Education

360 Nevada Street Auburn, CA 95603

530.889.8020 530.868.1367 FAX www.placercoe.k12.ca.us

October 10, 2005



Affred "Bud" Nobili Superintendent of Schools

> Larry Mozes, Ed. D. Deputy Superintendent Student Services

Maureen Burness Assistant Superintendent Placer SELPA

Thomas Hall Assistant Superintendent Administrative Services

Joan E. Kingery Assistant Superintendent Business Services

Randi Scott Assistant Superintendent Educational Programs

Karen Chizek Executive Director Special Education Services

> Debl Pitta Executive Director Educational Services

Mr. David Mohlenbrok Community Development Department City of Rocklin 3970 Rocklin Road Rocklin, CA 95677

SUBJECT: NOP for Clover Valley; Re-circulated Environmental Impact Report

Dear Mr. Mohlenbrok:

Thank you for the opportunity to respond to the Re-circulated Environmental Impact Report for the Clover Valley Project. Our last response on this project on behalf of Loomis Union and Placer Union High School Districts was in January 2000. The following updates are offered in response to the City's Request for Comments.

Both districts maintain their desire to serve the students generated from housing units that lie within the districts' boundaries. The Boards of Trustees will not support a request by the Rocklin Unified School District to annex the portion of the project that lies within the Loomis and Placer Union Districts into Rocklin Unified. The districts have, or will provide, capacity at their facilities to adequately house students generated from the project.

As indicated in our earlier letter, both districts would consider minor boundary adjustments in order to insure neighborhoods are maintained within a single district. The districts will be happy to work with the developer and the Rocklin Unified School District in any process to adjust boundaries to insure adequate neighborhood delineation. It will also be necessary to establish designated school bus turnout areas within the development.

Both districts have successfully passed general obligation bonds for school facilities which are reflected in new classroom and ancillary facilities at all campuses. Both districts assess fees on new construction as authorized by Senate Bill 50 and Government Code §65995. Currently the fees are \$2.24 per square and is divided between the districts.

County Board of Education

Don Brophy
Rich Cotwell
Norman Fratis, Jr.
Scott Gnile
Carole Oncrato
Kenneth Sahl
E, Ken Tokutomi

An Equal Opportunity Employer Clover Valley EIR Page 2 October 10, 2005

Thank you again for the opportunity to respond to this project. Please contact me at (916) 415-4424 if you need additional clarification.

Sincerely,

Cathy Allen

ÇÇ:

Director, Facility & Operations
Placer County Office of Education

Mr. Gigg Powers, Superintendent, Loomis Union School District Mr. Bart O'Brien, Superintendent, Placer Union High School District

Placer County Water Agency

Business Center: 144 Ferguson Rd. • Mail: P.O. Box 6570 • Auburn, California 95604-6570 (530) 823-4850 800-464-0030 www.pcwa.net



BOARD OF DIRECTORS
Pauline Roccucci • Alex Ferreira

A Public Agency

Otis Wollan • Lowell Jarvis Michael R. Lee David A. Breninger, General Manager Ed Tiedemann, General Counsel

October 11, 2005 File No. WA/Rocklin

David Mohlenbrok Community Development Department City of Rocklin 3970 Rocklin Road Rocklin, CA 95677

SUBJECT:

Notice of Preparation Clover Valley

Recirculated Environmental Impact Report

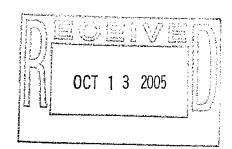


This letter is written in response to your request for comments dated September 12, 2005 for the Notice of Preparation for the Clover Valley Recirculated Environmental Impact Report. PCWA has the following comments:

PCWA's Antelope Canal traverses the eastern edge of the project. This canal delivers untreated water for irrigation purposes to existing customers downstream of the proposed project. Development of the project will require the canal to be encased in pipe in conformance with the Agency's improvement standards. Easements will be required for any proposed spills and access.

The PCWA Sunset Water Treatment Plant is located adjacent to the development and will continue to operate as it has in the past. Hazardous materials are routinely used and stored on site. The water treatment facility will be a source of noise and light near the development. Also located west of the project site are the Sunset Treated Water Storage Tank facilities and the Whitney Raw Water Reservoir. Potential storm water runoff and overflow from the Whitney Reservoir to the proposed Clover Valley Subdivision will need to be addressed in the design of the project's storm drainage facilities. PCWA will need a spill and drainage easement from the Sunset Water Treatment Plant through Clover Valley for emergency discharges. On May 4, 2000 PCWA executed a contract with Rocklin 650 Investors to provide emergency access to the proposed Clover Valley development. The contract required a spill easement be granted to PCWA for the existing Sunset Water Treatment Plant across Rocklin 650 Investors' property to Clover Valley Circle for use in the event of an emergency spill from the treatment plant. The contract also required a construction easement be granted to PCWA for the Sunset Tank Pipeline. Rocklin 650 Investors agreed to convey these permanent easements to the Agency on or before August 1, 2000. To date these easements have not been granted.

Current fencing around the water treatment plant consists of chain link fencing with barbed wire on top. This is PCWA's standard for securing water treatment plants. If the project proponent desires to install an alternative type of fence along the common property line, the type of fencing must meet with PCWA's approval and not compromise security of the water treatment plant.



PCWA currently maintains a 42-inch treated water transmission pipeline at the north end of the project. Development of the proposed Clover Valley subdivision will require that a connection be made between this pipeline and the proposed water distribution system for the subdivision. This will require an above-grade pressure reducing station, antenna, and related SCADA facilities. Depending on the size of the pressure reducing station a building (approximately 25 square feet) may be required to house the station. The station building will require in fee land. In order to provide future treated water service to lands along the ridge south of the proposed Clover Valley development, and to increase transmission capacity between the proposed development and the PCWA Midas Tank, certain water distribution pipelines will need to be oversized. The project EIR should evaluate the potential impacts of these water facilities.

The applicant has shown the proposed Valley View Parkway connecting Park Drive to Sierra College Boulevard. Please note that the west terminus of this road is shown encroaching upon PCWA property used for a 2.5 million gallon storage tank. The use of PCWA land for Valley View Parkway has not been reviewed or approved by PCWA Board of Directors. The proposed alignment will need to be presented to the PCWA Board of Directors for their review and approval after a request from the project proponent has been made.

In order to obtain treated water service, the developer will have to enter into a Facilities Agreement with the Agency to provide any on site or off site pipelines or other facilities if they are needed to supply water for domestic or fire protection purposes, and pay all fees and charges required by the Agency, including the Water Connection Charges (WCC). The Agency does not reserve water for prospective customers and this letter in no way confers any right or entitlement to receive water service in the future. The purpose of this letter is to apprise you of the current status of water availability from the Agency's treated water system at the location specified above. The Agency makes commitments for service only upon execution of a Facilities Agreement or service order agreement and the payment of all fees and charges required by the Agency. All water availability is subject to the limitations described above and the use by existing customers.

Thank you for the opportunity to review and comment. If you have any questions, please call me at (530) 823-4886.

Sincerely,

Heather Treio

Environmental Specialist

Deather Frejo

HT:ly

pc:

Brian Martin Mike Nichol Brent Smith Ross Hooper

Customer Service



South Placer Municipal Utility District

P.O. Box 45 – 3671 Taylor Road LOOMIS, CALIFORNIA 95650 Phone (916) 652-5877

September 15. 2005

City of Rocklin Community Development Department 3970 Rocklin Road Rocklin, CA 95677

Attention:

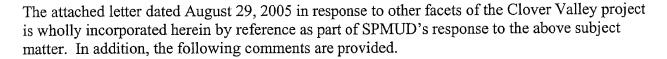
David Mohlenbrok

Subject:

Notice of Preparation

Clover Valley Recirculated EIR





The District will not consider for approval the potential on-site sewer alternative. The on-site and off-site sewer facilities that are required to serve the project shall be in general conformance with the District's Master Plan. Alternatives that may be considered by SPMUD are addressed in the attached letter.

With respect to sewer treatment capacity, the plants can currently treat up to 30 MGD average daily dry weather flow. Only ± 18 MGD is being utilized at this time, leaving approximately 12 MGD available for use. Under existing agreements this capacity is unreserved and available to the District (and its partners) on a first come first serve basis. Based on normal development timelines, the District anticipates that adequate treatment capacity will be available to serve Clover Valley.

With respect to sewer collection capacity (pipe capacity), the existing sewers in the vicinity of the project can only accommodate approximately 180 more homes under current connected conditions. Construction of the required off-site sewer must be completed, and the sewer accepted by SPMUD before service can be provided to additional homes in the project.

This letter does not constitute a reservation of capacity in the District's sewage treatment and collection facilities, nor does it constitute the assumption of a utility obligation to said lands or any portion thereof by the District.



City of Rocklin September 15, 2005 Page -2-

The District may be rendered unable to provide sewer service to said lands due to prohibitions or restrictions which may be imposed upon it by federal, state, county or local regulatory agencies having jurisdiction or due to conditions caused by an Act of God. Prohibitions and/or restrictions may be imposed at the Regional Wastewater Treatment Plant on the plant's capacity in accordance with existing agreements; this may also impact the District's ability to accept new applications for sewer service for the project. No restrictions currently exist.

Sincerely,

Richard R. Stein

Project Administrator

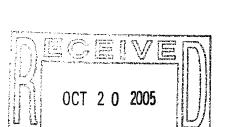
RRS:jag

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

California Highway Patrol 9440 Indian Hill Road Newcastle, CA 95658 (916) 663-3344 (800) 735-2929 (TT/TDD) (800) 735-2922 (Voice)

October 7, 2005

File No.: 9220.10284.8837. SCH#1993122077



Mr. David Mohlenbrok City of Rocklin 3790 Rocklin Road Rocklin, CA 95677

Dear Mr. Mohlenbrok:

Recently, the California Highway Patrol (CHP) Auburn Area had the opportunity to review the Notice of Preparation for the Clover Valley Large and Small Lot tentative Maps draft Environmental Impact Report, State Clearinghouse SCH#1993122077. We feel the growth discussed will have an impact on the mission of the CHP of ensuring safety and providing service to the public as they utilize the highway transportation system of Placer County. The addition of 558 residential units will add to the already overburdened transportation system in the Auburn Area. We look forward to reviewing the Environmental Impact Report when completed.

During certain phases of construction, we would recommend the use of CHP officers working construction zone enforcement to assist with securing the construction site and to aid in traffic control as needed on a reimbursable contract basis. The presence of uniformed CHP officers on site has shown to significantly improve the compliance of the motoring public to directional signs and traffic control personnel. Compliance reduces the exposure to danger faced by the on site construction workers and to the motorists traversing the construction site.

If you have any questions or concerns regarding our comments, please contact me or Officer M. Turner at (916) 663-3344.

Sincerely,

RICK WARD, Captain

Commander Auburn Area

cc: State Clearinghouse Office of Planning and Research, Attention: Scott Morgan

Special Projects Section, Attention: Captain L. C. Duncan Valley Division, Attention: Assistant Chief J. R. Rolin



DEPARTMENT OF FISH AND GAME

http://www.dfg.ca.gov Sacramento Valley - Central Sierra Region 1701 Nimbus Road, Suite A Rancho Cordova, CA 95670 (916) 358-2900



OCT 6 2005

October 4, 2005

Mr. David Mohlenbrok City of Rocklin Community Development Department 3970 Rocklin Road Rocklin, CA 95677

Dear Mr. Mohlenbrok:

The Department of Fish and Game (DFG) has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Clover Valley Large and Small Lot Tentative Maps (SCH# 1993122077). The project proposes a residential development on about 622 acres in the northeast corner of the City of Rocklin, Placer County.

Significant natural resources of the plan area include oak woodlands, wetlands, riparian habitats associated with Clover Valley Creek, as well as the potential for associated listed and sensitive wildlife species. The project proposes retention of about 366 acres of the project site as Open Space, primarily associated with the steep slopes of Clover Valley.

The DFG is providing comments in response to the NOP under California Environmental Quality Act (CEQA) as both a responsible and trustee agency. As trustee for the State's fish and wildlife resources, the DFG has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of such species. In that capacity, the DFG administers the California Endangered Species Act (CESA), the Native Plant Protection Act (NPPA), and other provisions of the California Fish and Game Code that affords protection to the State's fish and wildlife trust resources. The DFG recommends that the DEIR include discussion and evaluation of the following:

1. Analyze and discuss all reasonably foreseeable direct and indirect project-related impacts on biological resources due to project implementation. The analysis should focus, in particular, on the presence of and potential for habitats for all state and federal listed species and species of concern and the evaluation of direct, indirect and cumulative project impacts to these species and their respective habitat. This analysis should include discussion of adjacent habitats

Mr. David Mohlenbrok October 4, 2005 Page Two

outside of the project area that support or could support listed species or species of concern and that may be impacted as a result of project implementation or other proposed or potential projects in western Placer County.

- 2. Identify and discuss potentially feasible mitigation measures to address all reasonably foreseeable project-related impacts on biological resources. This must include identification of mitigation measures that minimize and fully mitigate all project impacts to state and federally listed species and species of concern. Analysis should include discussion of the ability to conserve natural resources onsite that may be achieved through project design and take avoidance measures and offsite mitigation obtained through acquisition of existing natural resources. Offsite conservation of natural resources should be consistent with the conservation strategy as envisioned as part of the Placer County Conservation Plan.
- Identification of any offsite infrastructure improvements required as part of this project and evaluation of potential project impacts due to these activities. Subsequently, the DEIR should identify and analyze potentially feasible mitigation measures that avoid or substantially lessen, and minimize and fully mitigate, all reasonably foreseeable direct and indirect impacts to biological resources.
- 4. Evaluation of the development of the proposed project's contribution to habitat fragmentation and population isolation of plant and animal populations including but not limited to listed species and species of concern. Include identification of potentially feasible mitigation measures that will avoid or substantially lessen these impacts.
- 5. Evaluate the consistency of the proposed project with the Placer County Conservation Plan effort. This analysis should specifically address the scientifically-supportable basis for the proposed project and all alternative development scenarios as subsequently suggested using sound principles of conservation biology. Describe measures that will assure that this proposed project is consistent with a long term conservation strategy for western Placer County.
- 6. Development of alternative development/design scenarios for the proposed project that will achieve most of the project objectives, and which will avoid or substantially lessen the project-related impacts on biological resources. The DFG believes such a potentially feasible alternative exists with respect to reduced impacts on biological resources generally and, in the alternative, at a minimum,

Mr. David Mohlenbrok October 4, 2005 Page Three

2 - 1 - 1 - 1

that such potentially feasible alternative exists with respect to listed species and species of special concern. Accordingly, the DFG believes that such alternatives should comprise part of the reasonable range of alternatives addressed in the DEIR.

- 7. Specifically develop an alternative design that reduces overall project extent by eliminating any and all proposed urban development proposed immediately adjacent to Clover Valley Creek (lots 71-95). We believe that this alternative design would reduce project impacts due to fragmentation, allow for continued animal movement along Clover Valley Creek, be consistent with a potential Placer County conservation strategy, and be scientifically defensible. We believe that this alternative is potentially feasible in that it may well achieve a majority of the project objectives and reduce potentially significant impacts on biological resources. Such an alternative should also be considered as part of the reasonable range of alternatives considered in the DEIR.
 - 8. Specifically describe all proposed uses and management strategies and activities associated with all Open Space. Differentiate between those uses of Open Space as allowed under the current General Plan and those uses that may be considered as compatible with the native plants and animals within the project area.
 - 9. Incorporate measures for Low Impact Developments as part of any project design in an effort to mitigate water quality impacts.

Thank you for the opportunity to review this project. If we can be of further assistance, please contact Mr. Jeff Finn at (530) 477-0308 or Mr. Kent Smith, Senior Environmental Scientist at (916) 358-2382.

Sincerely,

Sandra Morey

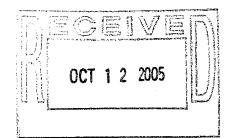
Regional Manager

cc: Mr. Jeff Finn Mr. Kent Smith Department of Fish and Game 1701 Nimbus Road Rancho Cordova, CA 95670

DEPARTMENT OF TRANSPORTATION

DISTRICT 3, SACRAMENTO AREA OFFICE Venture Oaks -MS 15 P.O. BOX 942874 SACRAMENTO, CA 94274-0001 PHONE (916) 274-0614 FAX (916) 274-0648 TTY (530) 741-4509





October 6, 2005

05PLA0075 SCH #1993122077 Clover Valley Large and Small Tentative Maps Notice of Preparation 05PLA80 PM 7.40

Mr. David Mohlenbrok Community Development Department City of Rocklin 3970 Rocklin Road Rocklin, CA 95677

Dear Mr. Mohlenbrok:

Thank you for the opportunity to comment on the Clover Valley Large and Small Tentative Maps. Our comments are as follows:

• We note that a traffic study will be conducted as part of the Environmental Impact Report (EIR). We request the opportunity to review the scope of work prior to the launch of the study to ensure the areas of concern for Caltrans are addressed. We welcome the opportunity to meet with you and your planning team as soon as possible to discuss the study, and offer any data that Caltrans may have to assist with this endeavor. Once the study is complete, we would like the opportunity to discuss the results and assess possible mitigation for determined impacts.

If you have any questions, please contact Bob Justice at (916) 274-0616.

Sincerely,

KATHERINE EASTHAM, Chief

Office of Transportation Planning – Southwest and East



STATE OF CALIFORNIA

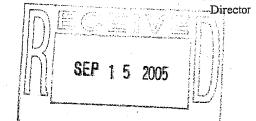
Governor's Office of Planning and Research State Clearinghouse and Planning Unit



Sean Walsh

Arnold Schwarzenegger Governor

Notice of Preparation



September 13, 2005

To:

Reviewing Agencies

Re:

Clover Valley Large and Small Lot Tentative Maps

SCH# 1993122077

Attached for your review and comment is the Notice of Preparation (NOP) for the Clover Valley Large and Small Lot Tentative Maps draft Environmental Impact Report (EIR).

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

Please direct your comments to:

David Mohlenbrok City of Rocklin 3970 Rocklin Road Rocklin, CA 95677

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

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

Sincerely, Jennifer Diemeyn

Scott Morgan

Associate Planner, State Clearinghouse

Attachments cc: Lead Agency

Document Details Report State Clearinghouse Data Base

SCH# 1993122077

Project Title Clover Valley Large and Small Lot Tentative Maps

Lead Agency Rocklin, City of

Type NOP Notice of Preparation

Description The project applicants are seeking approval of a large lot tentative subdivision map to subdivide 622+/-

vacant acres into 33 lots. The large lots would establish individual units being further subdivided by the proposed small lot tentative subdivision map. The small lot tentative subdivision map results in 558

single family residential lots.

Lead Agency Contact

Name David Mohlenbrok

Agency City of Rocklin

email

Address 3970 Rocklin Road

City Rocklin State CA Zip 95677

Project Location

County Placer

City Rocklin

Region

Cross Streets Sierra College Boulevard

Parcel No. Multiple

Township 11N Range 7E Section 5/6 Base

Proximity to:

Highways I-80/SR-193

Airports

Railways UPRR

Waterways Clover Valley Creek/Antelope Creek

Schools

Land Use Vacant

Project Issues Landuse; Aesthetic/Visual; Traffic/Circulation; Air Quality; Noise; Archaeologic-Historic; Biological

Resources; Geologic/Seismic; Toxic/Hazardous; Water Quality; Public Services; Cumulative Effects;

Growth Inducing

Reviewing Resources Agency; Office of Historic Preservation; Department of Parks and Recreation; Dep

of Water Resources; Department of Fish and Game, Region 2; Department of Health Services; Office of Emergency Services; Native American Heritage Commission; Public Utilities Commission; California

Highway Patrol; Department of Housing and Community Development; Caltrans, District 3; Air Resources Board, Transportation Projects; Integrated Waste Management Board; Regional Water

Quality Control Bd., Region 5 (Sacramento)

 Date Received
 09/13/2005
 Start of Review
 09/13/2005
 End of Review
 10/12/2005

Note: Blanks in data fields result from insufficient information provided by lead agency.

Dept of Parks & Recreation Environmental Stewardship

Wayne Donaldson

Preservation

Dept. of Forestry & Fire

Roger Johnson

Commission

Office of Historic

Allen Robertson

Protection

Colorado River Board

California Coastal Elizabeth A. Fuchs

Commission

David Johnson

Dept. of Conservation Gerald R. Zimmerman

Roseanne Taylor

California Energy

Dept. of Water Resources

Steve McAdam

Dev't. Comm.

Resources Agency Nadell Gayou

S.F. Bay Conservation &

Reclamation Board

Section

DeeDee Jones

NOP DISTRIBUTION LIST

Resources Agency

Nadell Gayou

Resources Agency

Last Updated on 08/10/05

Environmental Services Division

Fish & Game Region

Donald Koch

Fish & Game Region 2 Banky Curtis

Depart, of Fish & Game

Scott Flint

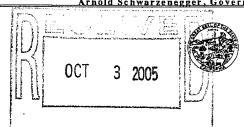
Fish and Game

Conservancy

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364 SACRAMENTO, CA 95814 (916) 653-4082 Fax (916) 657-5390

September 29, 2005



David Mohlenbrok City of Rocklin 3970 Rocklin Road Rocklin, CA 95677

RE:

SCH# 1993122077, Clover Valley Large and Small Lot Tentative Maps, Placer County

Dear Mr. Mohlenbrok:

The Native American Heritage Commission has reviewed the above mentioned NOP. To adequately assess and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

- 1. Contact the appropriate Information Center for a record search. The record search will determine:
 - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- 2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- Contact the Native American Heritage Commission for:
 - A Sacred Lands File Check. Requests must be made in writing with the County, Quad map name, township, range and section.
 - A list of appropriate Native American Contacts for consultation concerning the project site and to assist in the mitigation measures.
- 4. Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
 - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5 (e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

If you have any questions, please contact me at (916) 653-4038.

Sincerely,

Debbie Pilas-Treadway

Environmental Specialist III

CC: State Clearinghouse

PUBLIC UTILITIES COMMISSION

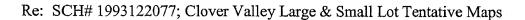
505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



October 18, 2005

David Mohlenbrok City of Rocklin 3970 Rocklin Road Rocklin, CA 95677

Dear Mr. Mohlenbrok:



As the state agency responsible for rail safety within California, we recommend that any development projects planned adjacent to or near the rail corridor in the County be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way.

Safety factors to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and appropriate fencing to limit the access of trespassers onto the railroad right-of-way.

The above-mentioned safety improvements should be considered when approval is sought for the new development. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists and pedestrians in the County.

If you have any questions in this matter, please call me at (415) 703-2795.

Very truly yours,

Kevin Boles

Utilities Engineer

Rail Crossings Engineering Section

Consumer Protection and Safety Division

cc: Jim Smith, UP

LAW OFFICES OF DONALD B. MOONEY

DONALD B. MOONEY Admirred in California and Oregon

129 C Street, Suite 2 Davis, California 95616 Telephone (530) 738-2377 Pacsinile (550) 758 7169 dbmooney@dcn.org

October 14, 2005

VIA FACSIMILE (916-625-5195) AND REGULAR MAIL

David Mohlenbrok Planning Services Director City of Rocklin 3970 Rocklin Road Rocklin, CA 95677-2720

Re:

Town of Loomis' Comments on City of Rocklin's Notice of Preparation For Clover Valley Recirculated Environmental

Impact Report

Dear Mr. Mohlenbrok:

The Town of Loomis submits the following comments on the City of Rocklin's Notice of Preparation for recirculated Environmental Impact Report for the Clover Valley Large and Small Lot Tentative Maps.

Transportation and Circulation: The Notice of Preparation identifies the 1. type of studies Rocklin will conduct. The Notice of Preparation, however, fails to address what happens if Sierra College Boulevard improvements run only from the freeway to Taylor versus from the freeway to Bankhead Road. The issue is having traffic, a lot of traffic, sorting itself out while trying to cross the railroad tracks versus sorting out after crossing the railroad tracks. Loomis favors improvements running to Bankhead because there will be safety issues if traffic must sort itself into lanes while crossing the railroad tracks.

Additionally, the recirculated EIR must address whether the traffic from Clover Valley will tip the scale to require that serious consideration be given to a separated crossing (bridge over, tunnel under). Sierra College Boulevard is the only north/south road connecting 193, I-80 and I-50 in this part of Placer County so in the event of emergencies it is a necessary road that should not be encumbered by a rail crossing.

The recirculated EIR must assess the impact that the Clover Valley Lakes project will have on the roads within the Town of Loomis and provide for an appropriate mitigation fee that would then be paid to Loomis. Local agencies often collect mitigation fees associated with projects within their jurisdiction and provide a portion of the mitigation fees to other agencies to avoid or reduce the impact to a level less than significant. There is simply nothing infeasible about

Mr. David Mohlenbrok October 14, 2005 Page 2

providing the Town of Loomis a pro-rata share of the mitigation fees collected. If mitigation fees constitute a feasible mitigation measure for the portions of Sierra College Boulevard in Rocklin, it is also a feasible mitigation measure for the portions of Sierra College Boulevard within the Town of Loomis.

The recirculated EIR must address impacts to Interstate 80. The improvements being made up to Douglas Blvd in Roseville will simply shift the necking down problem over to Rocklin Road and Sierra College Blvd interchanges. More traffic from another subdivision will have cumulative impacts to an inadequate I-80.

Clover Valley should build a facility for a train and bus stop in Loomis (Loomis already has the bus service) that would be a closer park and ride facility. Clover Valley could support Loomis' efforts to secure a train stop along the Amtrak Capital Corridor route. Thus Clover Valley would do its part for public transportation.

2. Public Services and Utilities: Loomis is concerned that Placer County Water Agency not be giving away water hook ups that might otherwise go to Loomis but are not used in Loomis because Loomis develops slower than the surrounding communities.

The recirculated EIR must provide a water availability assessment as required by Public Resources Code section 21151.9 and Water Code section 10910 et seq. The water availability analysis must also take into account the future water needs of surrounding communities such as the Town of Loomis. Water Code, section 10910 requires that any city that determines a project is subject to CEQA to identify any public water system that may supply water for the project and request that those public water systems prepare a specified water supply assessment. Section 10910 also requires a detailed assessment that includes an identification of existing water supply entitlements, water rights or water service contracts relevant to the identified water supply for the proposed project and water received in prior years pursuant to those entitlements, rights and contracts. If the assessments conclude that water supplies are, or will be, insufficient, the city, county or relevant water system must submit plans for acquiring additional water supplies.

Rocklin must also comply with the requirements of Business and Professions Code, section 11010 and Government Code sections 65867.5, 66455.3 and 66473.7, which prohibits local legislative approval of a tentative map for subdivisions greater than 500 dwelling units without either written verification from the applicable public water system that sufficient water is available or specified finding that sufficient water supplies are, or will be, available prior to completion of the project. A "sufficient water supply" means that the total water

Mr. David Mohlenbrok October 14, 2005 Page 3

supplies available during normal, single dry, and multiple dry years, within a 20 year projection, will meet the demands of the development, in addition to existing and planned future uses, including planned future uses in Loomis.

Very truly yours,

Attorney

Perry Beck, City Manager Town of Loomis Town Council CC:

Dave Larsen



September 22, 2005

David Mohlenbok CITY OF ROCKLIN Community Development Department 3970 Rocklin Road Rocklin CA 95677

Re: Clover Valley REIR

Dear Mr. Mohlenbok:

The California Oak Foundation (COF) appreciates the opportunity to comment on the Clover Valley (CV) REIR. For the public to properly assess CV project impacts to oak woodland resources and the development of feasible and proportional habitat mitigation measures, the following oak woodland information must be disclosed in the REIR:

2005

SEP 2 6

- 1. The number, diameter and acreage of all oaks impacted by each CV project alternative at the time of complete CV buildout.
- The total number of oak trees and oak woodland acreage in the region impacted by the CV project and the neighboring Bickford Ranch, Stanford Ranch, Sunset West, Twelve Bridges and Whitney Oaks projects.

The California Environmental Quality Act (CEQA) Guidelines set forth the minimum elements necessary for an adequate analysis of cumulative impacts: (1) a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; (2) a "summary of the expected environmental effects to be produced by those projects...," and (3) a "reasonable analysis of the cumulative impacts of the relevant projects." (Guidelines, § 15130, subds. (b)(2), (3).) In short, the essence of a cumulative impacts analysis is a list of projects, a discussion of their effects and a reasonable analysis of their cumulative impacts.

The 2002 CV EIR fell well short of these minimal CEQA requirements. It did not identify and summarize the incremental oak woodland impacts from any past, present or future projects off-site. Consequently, without this information, the 2002 EIR did not even attempt to analyze how these incremental effects might combine to deleteriously affect the oak woodlands environment.

An explanation of how the oak woodland mitigation proposed for the CV project achieves feasible and proportional habitat mitigation to satisfy the California Environmental Quality Act.

Thank you for your attention to this important matter.

Sincerely,

Janet Santos Cobb, President



Janet Santos Cobb President

Tom Gaman Vice President

Lesa McDonald Chan Secretary

Irene Tsukada Germain

Carol Baird Lynn Barris Michael Beck

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"Where do rivers start?"
In threads in hills and gather to here—
but the river is all of it everywhere,
all flowing at once,
all one place.

- Gary Snyder

916 771-2013

P.O. BOX 1311 ROSEVILLE, CA 95678-8311

October 14, 2005

David Mohlenbrok Senior Planner City of Rocklin, Community Development Dept. 3970 Rocklin Road Rocklin, CA 95677

Re: Clover Valley Lakes Notice of Preparation

Dear Mr. Mohlenbrok:

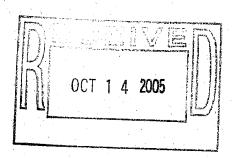
Thank you for the opportunity to raise issues we believe should be considered in assessing the impact of this project.

The Dry Creek Conservancy has specific concerns that should be addressed in the Clover Valley Lakes Development regarding impact on the local ecology and the Dry Creek Watershed. Preserving Clover Valley and the creek within the valley is important not only for the Dry Creek Watershed to maintain its health but for the City of Rocklin to reflect the desires of the community to maintain the aesthetic beauty and all the cultural, historic, animal, aquatic and plant life within this scenic valley.

Numerous studies have shown the negative impact of development on riparian systems, e.g., *Impacts of Impervious Cover on Aquatic Systems*, Center for Watershed Protection, March 2003. Impacts on the riparian area include:

- Increased runoff volume and peaks resulting in changes in channel geomorphology.
- Reduction in habitat due to erosion and increased flows.
- Introduction of fish barriers from roads and utilities and increased flows resulting in channel morphology changes. Sewer and other infrastructure that cross the creek create barriers over time as down cutting of the channel bottom exposes them. Of particular concern are creek crossings that may create erosion and sediment in the channel and on the banks as well as creating a fish barrier. Water quality impacts such as increased sediment, introduction of chemicals such as oil and grease, nutrients, and pesticides, and increased temperature.

The Dry Creek Watershed has recently been designated as critical habitat for Central Valley California Steelhead trout which includes waters with potential for habitat. Under ESA requirements all federal agencies "must ensure any actions they authorize, fund or



carry out are not likely to jeopardize the continued existence of a species, or destroy or adversely modify its designated critical habitat."

Hydrology and Water Quality:

Water quality monitoring should be done during and after the project to determine impacts of the project. A regular quarterly monitoring schedule should be followed after project completion. A baseline assessment of creek health should be performed before the project.

Monitoring should include:

- Stream Flow (discharge),
- Standard parameters Water Temperature, pH, Electrical Conductance, Specific Conductivity, Dissolved Oxygen, NTU Turbidity, Total Suspended Solids, Total Dissolved Solids, Alkalinity, Hardness, Oil and Grease, Biological Oxygen Demand
- Nutrients (NH₃-N, NO₃-N & O-PO₄,
- Special analyses Total Organic Carbon, Soluble Metals (CAM 17), Total Mercury (Cold Vapor), OP Pesticides, Herbicides and Glyphosate.
- Biological samples should include total Coliform and E. coli as well as benthic macroinvertebrates at least annually.

Storm water and Runoff

The cumulative effects of storm water runoff on water bodies are evident across the state. Streams draining urbanized areas have fair to poor water quality due to storm water runoff, failed septic tanks, and point sources. Uncontrolled storm water runoff has many impacts on humans and the environment. The impervious cover problem will add to the current flooding problem observed frequently, increase scouring of the channel -- not to mention the increase amounts of pollutants added to the stream system. The project should implement an innovative storm water management program that takes advantage of natural vegetative filters and groundwater infiltration techniques. Use Low Impact Development including onsite measure such as, vegetated swales, rain gardens, green roofs and porous pavements to reduce storm water infiltrating into the soil. The project should emphasize use of native and non-invasive plants that require low use of pesticides and utilize landscapes that have low water needs.

The Project should evaluate the impact of the Clover Valley Parkway on the creek such as air pollution, oil and gas and roadway run off. Proponents should consider relocating the parkway around the project and not crossing Clover Valley Creek. Low level lighting should be used on the roadways and throughout the project to minimize the impact on wildlife.

Setbacks

The Dry Creek Conservancy recommends that the riparian setbacks include the entire active flood plain and an additional 30 m (98 feet) buffer as recommended by a recent Jones and Stokes Associates study commissioned by Placer County. Riparian vegetation in Placer County makes up less than 0.5% of the total land area. Yet, riparian habitats have long been recognized as important to ecosystem integrity and function across

landscapes. Riparian habitats have been identified as the most important habitats to land bird species in Placer County, yet they have been decimated over the past 150 years. There has been no estimate for the total historical extent of riparian habitat in Placer County. Current estimates of remaining riparian habitat in the state range from 2% to 5% for the Central Valley. Special efforts should be made to prevent creation of habitat islands within open space.

Vernal Pools.

Efforts should be made to preserve vernal pool complexes in viable sizes in upland areas as well as riparian areas. Impacts of land resurfacing near those sites should be assessed and avoided.

Open Space

Preserved areas that are designated open space should be protected by easements in perpetuity. Critical portions of open space should remain natural and without human interference which includes, paths, lighting or changes in vegetation (mowing).

Please feel free to contact us if we can provide clarification of these comments.

Sincerely,

Executive Director

VIA FACSIMILE

OCT 1 7 2005

Granite Bay Flycasters 4120 Douglas Blvd. #306-356 Granite Bay, CA 95746-5936

October 14, 2005

Mr. David Mohlenbrok City of Rocklin 3970 Rocklin Road Rocklin, CA 95677 Fax: 916 625 5195

1 401. 710 023 3173

Dear Mr. Mohlenbrok:

Re: Notice of Preparation for the proposed Clover Valley development in Rocklin

Our understanding is that, within the referenced project, protection for Clover Valley Creek may not meet the recommended minimum 100 foot setback of the creek as recommend by California Fish and Game. Our 360 member organization is opposed to any plan that is less than the California Fish and Game recommendation and we are especially opposed to having any form of "average" setback where some areas may be less than the minimum recommendation.

Best Regards,

R. Heath Wakelee

VP Conservation

Granite Bay Flycasters Phone: 916 870 5253

Fax: 916

916 625 1372

E-mail: gbfconservation@cs.com

B. Hust Walle

October 10,2005

David Mohlenbrok 3970 Rocklin Rd Rocklin, CA 95677-2720 Fax-916-625-5160

RE:

Notice of Preparation Clover Valley Recirculated EIR

Dear Mr. Mohlenbrok,

I am writing on behalf of the Looms Basin Horsemen's Association (LBHA), an organization of more than 500 equestrians and equestrian businesses in South Placer county and beyond, with our comments on the scope of the above-referenced EIR.

We reviewed the former draft EIR carefully and concluded that the overall unmitigable impacts of a development of this size and density in Clover Valley are inconsistent with the existing infrastructure and open space. The changes necessary to accommodate the development as proposed would have wreaked havoc on Rocklin's community creating excessive tree removal, traffic problems, sewer line construction, wetlands fill, destruction of archeological resources, water quality, and loss of wildlife habitat. The project would have resulted in a loss of rural lifestyle far beyond its actual boundaries. Thus, we favored the no project alternative.

We are still concerned about these issues, though the revisions to the project appear to address many of them. I am sure that other parties will address these issues with respect to the scoping of the EIR, so I will limit my comments to issues of particular concern to LBHA.

We feel that this part of Southern Placer County does and shouldpreserve the historic and rural lifestyle of its residents. We believe that Clover Valley should not be developed as a traditional subdivision. Thusthe EIR should directly address the following issues:

1) Impact on open space-especially that which is contiguos to

existing open space. Such contiguity should be preserved wherever possible to provide a visual and noise "buffer zone".

- 2)Impact on alternatives to vehicular transportation and an analysis of provision of such alternatives. The EIR should consider the provision of off-road trails (NOT on-road or paved bicycle trails) for use by pedestrians and equestrians which connect to existing formal or informal trails in and outside of the project, all trails shown on existing circulation plans, existing and new parks, open space and provide access to schools.
- 3) impact on rural uses-particularly the ability to keep livestock on suitable lots or through leasing of appropriate portions of the open space for livestock purposes. The developer should not be able to prohibit livestock through private CCRs if the standards of existing zoning permits those uses.

You may contact me or LBHA at the address above with any questions you may have. Thank you for your time and attention.

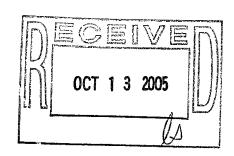
Sharon D. Roseme 9217 Los Puentes Road Newcastle, CA 95658 916-663-3450 sroseme@garlic.com

SUR



October 13, 2005

David Mohlenbrok Planning Department Staff City of Rocklin 3970 Rocklin Rd. Rocklin, CA 95677



Dear Mr. Mohlenbrok and Planning Department Staff:

I am writing on behalf of a volunteer coalition of individuals and groups interested in saving and preserving the remaining 622 acres of Clover Valley. Should you wish to learn more about our organization, its history and activities, may I refer you to our website: saveclovervalley.org

On behalf of Save Clover Valley, I would like to thank you for this opportunity to make comment on the NOP of the Clover Valley Recirculated Environmental Impact Report (REIR). Our group respectfully requests the City of Rocklin respond to our comments in light of the California Environmental Quality Act (CEQA) and its caveat:..to consider the cumulative environment effects...before a project gains irreversible momentum.

That being said, and prior to making specific comments on behalf of our group, I would like to commend the City of Rocklin for serving as professional and pro-active hosts during last Wednesday's public scoping meeting. In keeping with the individuals who spoke in opposition to the proposed project, we would like to again emphasize CEQA's provision, for a governing entity such as the Rocklin City Council, to vote NO PROJECT should there be fact and findings of overriding considerations. Given the severity of the approaching project, we believe the following outlines some of the overriding considerations:

RE: TRAFFIC

Our first comment concerns the development or non development of Creekside, the currently- illegally gated public roadway that leads into the north end of the valley. Creekside, in its current status of a public roadway (albeit one used infrequently), could and should be considered as a viable alternative to the proposed Valley View Parkway. As we understand it, the city has asked the developer not to preclude Creekside as a connector route. The City of Rocklin needs to follow the future of this road closely and make sure that any decisions made are in the best interests of the entire Rocklin community and not just a few who might benefit from securing the road as a private, or easement only, roadway.



2. The proposed Valley View Parkway is a major concern for our group and others Concerned by the increased traffic in and around Rocklin. We request a traffic study showing the impact of the proposed 2-4 lane roadway with 3 traffic lights. What volume of traffic is expected along this road? If 12,000 cars per day on two lanes, what traffic rating would be assigned – a C? an F? And if the intent is a two lane road then why a 80 foot wide bridge over Clover Valley Creek?

Realistically, how does the proposed Valley View Parkway serve the citizens of Rocklin? It seems the residents of Bickford Ranch, Twelve Bridges and Lincoln would benefit most from the proposed parkway.

The proposed Valley View Parkway would add traffic to the soon-to-burgeon Park Drive. Are traffic lights also planned for Park Dr. through the Whitney Oaks/Springfield development? As you know, Springfield is an active-adult community with many residents who would consider themselves as 'elderly.' What considerations does this proposed parkway have for them? Further, the inevitable increased traffic on Park Dr. would also affect other senior housing communities — Casa de Sante Fe, at Park and Standford Ranch, and Villa Serena, also on Park Dr. Villa Serena residents have already voiced concern over safety issues relating to the increased traffic.

Another significant consideration of this proposed parkway relates to the increased traffic on Park Dr. and its effect on three schools: Granite Oaks Middle School, Rocklin High School, Victory Continuation High School. How will the volume of traffic – especially at the start and end of the school day be handled? Will Rocklin pay for the extra patrol hours needed for a 5-day/week traffic officer to monitor the school-related traffic and thereby promote the safety of our young people?

The City of Rocklin needs to fully address the community and regional traffic impacts, including potential problems, accidents and fatalities. This is of special concern due to the slope of the proposed parkway.

Finally, on this matter, we request the City of Rocklin disclose who will pay for construction and maintenance of the proposed Clover Valley Parkway. Will the citizens of Rocklin be taxed now or in the future?

RE: AIR QUALITY

The NOP states Rocklin's status, "as severe non attainment for ozone." We have heard, off the record, members of your department downplay this with comments like, "The whole region has an air quality problem." This does not make the fact less onerous.

What could the adverse air quality impacts be, from the development of Clover Valley, as relates to diesel exhaust, PM10 and Nox? How can the proposed development meet legal requirements for attainment of ozone and particulate matter? This is very important, when, as stated above, seniors and children are concerned: Diesel exhaust is a known carcinogen.

Clover Valley's parameters were formed thousands of years ago and the steepness of the valley sides logically point to a compact area that can and inevitably will trap air – from cars, barbeque grills and other urban lifestyle toxins.

We are requesting that site-specific data concerning air quality be included in any future reports made on the proposed development of Clover Valley. We suggest it is vital that the City of Rocklin make a full study of Public Resource Code 2108.6. Violations of this public code are not acceptable.

RE: CULTURAL RESOURCES

Members of Save Clover Valley are very concerned about the preservation of the cultural resources found in the valley. We are reminded of a Lakota proverb that is instructional to all parties. It reads: We do not inherit from our ancestors, we borrow from our children. Can the importance of preserving valuable, historical cultural resources be stated more clearly? We don't think so.

Throughout the community, the word has spread that in the last DEIR, of August 2002, inclusion of a well-written and significant archaeological report by Peak and Associates was omitted, thereby preventing community residents and other interested parties from understanding the significance of the Peak report findings. One of the most telling findings is that there are 33 sites that qualify for the National Register of Historic Places. The Peak Report, secured by our group through the Freedom of Information Act, shows in stunning fact the 7000 span of history housed in this valley. The thought of paving over burial grounds, ancient village sites and significant artifacts seems reprehensible to us.

We are requesting a new archeological report, covering the entire valley, be conducted through **Peer Review** by a mutually- chosen archeological firm. The fact and findings of this report should be included, in entirety, in future Environmental Impact Reports for the proposed Clover Valley development.

Further, in deference to the sacred quality of the cultural sites, we request that representatives from regional tribes, such as the United Auburn Indian Community, UAIC, be fully engaged in all facets of the Peer Review – including follow up commentary.

RE: WATER QUALITY

The quality of our region's water is of the utmost importance. When assessing the possible development of a project like Clover Valley, both the availability and quality of water must be assessed.

We are requesting that the REIR make a full report on water quality as relates to Section 303(d) of the Clean Water Act. Two important water sources stand to be impacted by the proposed development: Clover Valley Creek and the region's aquifer.

Concerning the later, what could the impact be on Rocklin's neighbors, primarily in Roseville, if urban toxins from pesticides and fertilizers, are allowed to contaminate the regional aquifer?

The Clover Valley Creek is part of the Dry Creek Watershed and is home to the Central Valley Steelhead. What other species make this creek their home? This question must be answered in the REIR.

Additionally, we are aware that in 1995 a DEIR was circulated which specified the requirement that all developments in Clover Valley obtain a new wetland delineation. We request that the City of Rocklin maintain this standard. One only need to reflect on the recent hurricane in coastal Louisiana to see how the loss of wetlands grossly impaired both the environment and the regional community.

Further, Save Clover Valley requests that a full water impact study be conducted for the REIR – a study that will address the wetlands, aquifer and water availability concerns.

RE: QUALITY OF LIFE

Discussion of quality of life issues is often a subjective one. We would suggest there are objective perspectives to be addressed when considering quality of life issues as relate to the proposed development of Clover Valley. As an example, Save Clover Valley concurs with the statements made during this NOP scoping process by the California Oaks Foundation (letter dated 9/22/05). The oak canopy is an incredible environmental resource and should be preserved.

Another quality of life issue, we believe, concerns the construction of the sewer line the proposed housing development would require. We request the Rocklin Planning Commission make a full and early disclosure of this potential sewer line, including the roads and homes to be impacted and the costs associated with the line. The home owners impacted by the construction of the sewer line need to be notified **before** final approval of the project.

We would also ask that every member of the Rocklin Planning Commission and Rocklin City Council consider each and every comment germane to the proposed valley development. As public servants, it is incumbent upon them to answer honestly the question: Who is best served by this development? We suggest that the common good is the noblest cause for which the city planners can aim. Benefiting a developer and creating a setting for 558 homeowners does not serve the common good.

Members of our coalition are often told, even off the record, by city fathers, that, "this is a done deal." We suggest that this reply is not apt and flies in the face of our state's

CEQA law which encourages public comment on projects like the proposed Clover Valley development. Further, when we have debated the proposed Valley View Parkway in various venues throughout the city, we are sometimes told, "That's in the general plan already." Such a statement seems to imply that there can be no changes made to the General Plan. However, the developer is currently seeking amendments to the General Plan. Citizens, too, have a right to request amendments to the General Planespecially if these requests improve the community's quality of life.

RE: A NEW VISION OF THIS PRECIOUS VALLEY

Save Clover Valley would like to offer a new vision to the City of Rocklin planners for Clover Valley – a vision that doesn't include houses, streets, gates and street lights.

We respectfully request that the dialogue be open to considering how a regional approach to development of a park or conservancy could be developed. There are still so many places to build homes, perhaps not in Rocklin, but certainly in Placer County. There are no nearby places, still in existence, like Clover Valley.

Rocklin could be known, regionally and nationally, as the city that had the courage to realize a different path than the typical city that sees only housing developments as the natural course of action for open space. We suggest that the city approach the developer with the idea to create something of value for the **entire community** – not the elite few who could afford to million-dollar plus home in Clover Valley.

If a regional coalition, coupled with grant monies and federal funds, were coordinated, we believe the developer would not walk away with nothing in his bank account. The developer could even be approached to offer his or his family's name to a regional park. The name(s) could be kept in perpetuity on the moniker of a regional facility. We suggest there may be tax credits the developer could realize, in addition to the personal, eternal satisfaction of *noblesse oblige*.

Thank you for your attention to this letter. Please keep our group apprised of any matters we should be privy to concerning the proposed development of Clover Valley.

Very Sincerely,

Allison Miller, Chair Save Clover Valley



CLOVER VALLEY FOUNDATION P.O. Box 713 Loomis, CA 95650



Placer Group P.O. Box 7167 Auburn, CA 95604

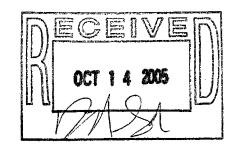


PO Box 1937 Grass Valley, CA 95945

October 11, 2005

Attn: David Mohlenbrok Planning Department City of Rocklin 3970 Rocklin Road Rocklin, CA 95677

Ladies and Gentlemen:



RE: CLOVER VALLEY NOTICE OF PREPARATION (NOP)

Thank you for the opportunity to provide these comments on the NOP of the Clover Valley Recirculated Environmental Impact Report (REIR). City of Rocklin (City) staff is to be commended for the thorough distribution of the NOP and the extension of the public scoping meeting time frame on October 5. Also, some of these comments were written before the October 5 scoping meeting. It appears in reading the City's handouts and talking to staff and consultants at that meeting, that some of the issues mentioned here will be analyzed, assuming the impacts compiled on the handouts are addressed.

- 1. Although the project can be defined as 622+/- acres, we believe the addition of the word "vacant" could be misleading and possibly set a tone that dismisses the rich resources existing in the valley. A more appropriate word might be "undeveloped."
- 2. In stating the chronology of events in the NOP, we read that the Large Lot Tentative Subdivision Map (LLTSM) was submitted in October 2000, and the NOP was distributed in April 2001, but that the LLTSM was "modified" in October 2001. This would indicate that the modification came after the NOP. Can we assume these modifications were minor and that the chronology is correct?
- 3. Although it is stated that the previous comments submitted do not require a written response in the Final EIR, they will be considered in the REIR. How does the City intend to "Consider" but not respond? Can we assume the previously submitted comments are a part of the

legal record? Please consider <u>all</u> of the approximately 88 pages of NOP comments submitted and contained in the 2002 DEIR to be a part of the record. Although some of the points may no longer be relevant, the vast majority of what was submitted is still important and must not be ignored or omitted.

Due to the potential extreme importance of what is or is not included in the legal record, it is noted with some concern that there is uncertainty and confusion as to which parts of the previous DEIR (in addition to previous NOP comments) will or will not be included in the REIR analysis. Also, because the project has changed, new information has surfaced; growth in the region has increased beyond estimated previous forecasts; and 1995 FEIR information and the 2002 DEIR are now outdated, it is impossible to understand which impacts are being carried over and which are no longer appropriate. Please consider the circulation of a completely new EIR, or consider including all comments from the 2002 DEIR, as a part of the legal record of the Clover Valley REIR.

Because the "Program" EIR was improper and inadequate for this proposed project, a new, "Project" EIR should be required.

With all due respect to consulting firms, the new EIR and all assessments and studies should be prepared by disinterested parties to avoid any perception of impropriety. Anyone involved in a former business or employee/er relationship with either the applicant or the lead agency should recuse themself(ves) to insure impartiality.

- 4. The City should not proceed with an REIR for the proposed project until and unless an environmental assessment of the General Plan Amendment and Rezone is addressed and completed. The amendment and rezone warrants critical evaluation in light of potential constraints including but not limited to non attainment for ozone and particulate matter. Has Rocklin completed a General Plan update? And if so, was an EIR circulated? If an EIR is circulated, the proposed Clover Valley project should not proceed until the City's plans have been thoroughly evaluated (and a Final EIR has been certified for the General Plan Update).
- 5. Reference to "encroachment into the 50-foot creek setback area at two locations" implies an acceptance and/or adoption of 50-foot setbacks. Isn't this a premature conclusion when a 200-feet setback may be required (a 100-feet setback was recommended by Calif Dept of Fish and Game in their NOP comment letter of May 23, 2001). In addition to the creek, setbacks and buffers of similar distances must be required for the outer edges of the wetlands as well.

As noted in the previous NOP comments from California Fish and Game, May 23, 2001, "Intermittent streams and swales should be protected by no less than a 50-foot non-building setback buffer..." However, today even greater setbacks should be considered for such intermittent streams and swales, especially when critical habitat of a listed species is involved.

At the August, 2005, Dry Creek Watershed Council meeting, the following was presented from the *Secret Ravine Riparian Buffer Analysis Presentation:*

The assessment had been expanded to continue the effort, begun by Placer County Planning in conjunction with the county's Placer Legacy program, to determine a scientifically defensible width for riparian buffers appropriate for western Placer County. The following is excerpted from their PowerPoint presentation:

- What is a suitable buffer?
 - Jones & Stokes Report 2005, Setback Recommendations to Conserve Riparian Areas and Streams in Western Placer County
 - Prepared for Placer County Planning Dept.
 - Recommended setback: active floodplain plus 100 feet (30m.)
 - Active floodplain: area of typical 10 year flood
 - 100 ft added to protect most values
 - 300 ft added to protect terrestrial wildlife

Thus, it is requested that the Clover Valley NOP support at least 100 feet, but preferably 300 feet setbacks for the creek and 100' setbacks for intermittent streams and swales.

- 6. Please address at what point of the proposed development the "future fire station" will be built and how it will be financed—construction, maintenance, etc. Will a performance bond be required?
- 7. Please discuss the environmental impact of slope and drainage easements that "would be created within the open spaces...." Will the easements be recorded in perpetuity? Who will monitor and maintain the open space areas?

Also, address the financial obligations (long- and short-term economic impacts) and monitoring strategies whether these areas are deeded/dedicated to the City and/or the HOA (as indicated on the maps).

Address consequences should the HOA be unable or unwilling to monitor or maintain easements.

- 8. In the event of developer or owner insolvency, especially with regard to mitigation measures (monitoring, maintenance, etc.), please discuss City and/or HOA options/obligations. If owners are protected by either corporate veil or other limited liability organization, performance bonds must be required to insure mitigation measures would be fulfilled through buildout and beyond.
- Please give detailed disclosure of how many of each of the various oak tree species will be removed with not only road construction but also the remainder—the entirety—of the proposed project.

Estimate and address the "collateral damage" or kill which will kill trees from disruption of the ecosystem (i.e., drip line vulnerability). The extensive deforestation and replacement of vegetation with acres of cement and asphalt would raise the ambient air, water and soil temperature considerably, thereby affecting the surrounding ecosystem. The constant irrigation needed for the replacement trees may also damage drought-resistant oak roots.

Analyze the significant issues regarding regeneration concerns with blue oak woodlands. The over 12,000 blue oaks in Clover Valley may be the largest, lowest (elev) and most contiguous stand in Placer County.

Consider the inequity and inadequacy of replanting trees in an attempt to replace mature oak woodlands. A replanted tree does not equal an established oak. Exchanging mature oak stands for saplings is not an equal trade.

Analyze the benefits of one established tree—soaking up lethal toxins from ground waters and air pollutants; capturing rainwater; reducing storm water runoff, flooding and erosion; taking in carbon dioxide and producing oxygen; cooling air naturally through water evaporating from leaves and direct shade; reducing the impacts of smog and overall air pollution.

Special Tree Note—The "existing tree inventory" which was perused in the Rocklin Planning Department did not indicate which trees were to be removed or to be protected.

- 10. With regard to "compatibility" with Clover Valley Woods, by today's standards, many homes in Clover Valley Woods would not be allowed to be built where they are now situated. Please define the concept of compatibility, analyze its impacts, and use caution in compatibility comparisons.
- 11. Please address open space requirements as meaningful designations and not merely by products of otherwise unbuildable land. For example, slopes over 20% (but especially 30-50%), creek beds, sacred sites, and/or wetlands cannot or should not be developed or utilized in the common sense understanding of what Open Space represents to the public--nor should their perception as a "gift" to the public be inflated.

12. A reasonable range of CEQA alternatives must include, in addition to those listed, a re-routing of the proposed Valley View parkway, an all-out genuine effort to promote and provide public transportation, and realistic estimates of fuel and energy costs/supply predictions for 2025.

By the time the Final EIR is circulated, the Placer County Travel Demand Model even when revalidated for 2004 conditions will be inadequate for meaningful or acceptable analysis. Traffic from Lincoln's newly anticipated and planned growth, along with other developments may not accurately forecast or allow for accurate analysis under the four scenarios. Please conduct a new transportation study in order to properly reflect true traffic impacts.

Before proceeding with the proposed project, consider regional cumulative impacts of previous possibly irresponsible land use decisions; attempt to find regional cooperative alignments for thoroughfares or connectors; and attempt to create public transportation solutions before allowing developers to slap down more roadways, willy nilly, hoping the environmental impacts will not be realized in their lifetimes.

To place a major intersection near the top of a relatively steep slope and sharp curve on to a road with a posted speed limit of 55 mph (Sierra College Blvd) is to invite disaster. The proposed Valley View Parkway/Sierra College Blvd intersection must be thoroughly analyzed as to its level of safety for human and animal life. The City must prioritize safety over convenience and consider "no parkway" as a viable alternative.

Alternative, less invasive and less environmentally destructive routes for Valley View Parkway to eliminate the necessity of 60 feet "cuts and fills" should be provided (i.e., following the proposed Clover Ranch Road, or Forrest Clover Road, to an alignment with the existing public road known as Creekside Road at the north end of the valley could bring traffic out on to Sierra College Blvd and eliminate the necessity for Valley View Parkway as well as all its impacts).

Consider the possibility that Clover Valley's pristine landscape does not have to be sacrificed to provide a dubious "traffic corridor" solution to the cumulative impact scenarios of the estimated 2025 development levels in the Cities of Rocklin, Roseville, Lincoln, and Placer County.

13. Since the most recent archaeology report may not have covered all of the potential pre-historic site locations, please require a new, independent archaeological study of the proposed project's 622 acres. Consider sites that have been overgrown by berries and or brush that are currently inaccessible, but with proposed construction, will be exposed.

Analyze the placement of roads, utilities, and lot sites and require that they avoid all known prehistoric sites. Also, should other sites be identified, they too must be preserved by avoidance, and not by capping.

Include the United Auburn Indian Community, the nearest recognized tribe to the proposed project site, in all mitigation, monitoring, and repatriation issues.

14. Please address Clover Valley Creek as an integral part of the Dry Creek Watershed and its importance as a part of the critical habitat for the listed Central Valley steelhead.

Court decisions have determined that the critical habitat may not be limited to just the creek. (The Ninth Circuit court ruled on August 6, 2004 in a case Gifford Pinchot Task Force v. U.S. Fish and Wildlife Service, 00-5462, and there was a similar court decision in California in the Ninth District, American Motorcycle Ass'n v. Norton, 03-3807 SI, D.D.C. Both of these cases may have significant relevance for expanded descriptions of what constitutes the "habitat" and should be thoroughly analyzed.)

How will the proposed Clover Valley project comply and compliment the "Dry Creek Watershed Coordinated Resource Management Plan?

The Dry Creek Greenway Regional Vision project is a multi-community/county project whose purpose is to encourage the conservation of lands within the Greenway (Dry Creek

Watershed) as a permanent connected open space system. How will Rocklin and the proposed Clover Valley development enhance and participate in this visionary project?

15. Please address Clover Valley Creek's future as a viable spawning area for anadromous species if/when fish passage is restored downstream, which is not only possible but also already occurring in the Dry Creek Watershed as well as other areas.

Analyze the proposed creek crossings as to their suitability for wildlife passage. Culverts or low bridge crossings are unacceptable and will lead to road kill and other undesirable impacts for many species.

Analyze the many geomorphologic changes that occur with either culverts and/or bridges with regard to Clover Valley Creek.

A detailed analysis of potentially significant impacts to biological resources must be prepared by a qualified, independent biologist with expertise in woodland, grassland, and aquatic habitats. The biological resources study must be based on surveys and detailed field studies that are completed at appropriate times of the year for each species. The California Department of Fish & Game's "California Natural Diversity Database" (CNDDB) would provide a start, but a more detailed study and survey must be completed.

Construction activities must be stopped whenever a species or its habitat is observed and is in peril. Although a nest site may be avoided for one season, many raptors, herons and other bird species return to the same nesting site year after year. Nest sites must not be destroyed until it is determined that over a two- or three-year period, the site has been abandoned.

- 16. In addition to mosquito abatement, please address the stability of pyrethrin when it comes in contact with water (as opposed to stability when exposed to just air) as well as its resultant negative impact on fish, bugs, and other aquatic resources, especially downstream.
- 17. Please analyze the potential impact to local and regional flood plains that will be impacted by the considerable cumulative impacts of the increased impervious surfaces with the proposed project. Flooding issues should be analyzed in view of the steep slopes, run off, wetlands, etc.
- 18. Please address sewer line, creek crossing, and other construction timing with regard to sediment loads, temperature, flow fluctuations, and any other creek disturbances and impacts during critical fish migration or spawning activities.

Require optimum timing of all construction activities to have no disruption of downstream aquatic resources. Require sufficient funding for creek monitoring. Require bond posting for violations, accidental or otherwise, that result in any type of creek degredation.

Analyze the potential of deleterious effects of run off into the creek from chemicals used by homeowners (herbicides, pesticides, fertilizers, etc.) primarily for landscaping or other activities. Require sufficient funding for long-range monitoring.

Consider run off design with no road "crowns" (which forces run off to the sides and into waterways) but rather "valleys" where run off flows to the center of the road, allowing planted medians to act as filters, and thus lessening contamination and pollution of aquatic resources.

19. Please include as a part of the "No Project Alternative," a consideration of a wildlife preserve or sanctuary that would include interpretive centers, museum, non-invasive trails, and the preservation of the known pre-historic sites.

Consider the economic long-range opportunities and benefits of such an alternative to the City and the larger region (including but not limited to tourist dollars and educational opportunities).

Secretary of the Interior Gale Norton (Oct 2005) released a report that shows recreational use on national wildlife refuges generated almost \$1.4 billion in

total economic activity during the 2004 fiscal year. The report, Banking on Nature 2004: The Economic Benefits to Local Communities of National Wildlife Refuge Visitation, was compiled by U.S. Fish and Wildlife Service economists.

According to the study, nearly 37 million people visited national wildlife refuges in 2004, creating almost 24,000 private sector jobs and producing about \$454 million in employment income. Additionally, recreational spending on refuges generated nearly \$151 million in tax revenue at the local, county, state and federal level.

"Our national wildlife refuges are not only beautiful places where fish and wildlife can flourish, they are also economic engines for their local communities, providing jobs, customers for local businesses, and tax revenue for local governments," Secretary Norton said. "With 17 new refuges and a 30 percent increase in the refuge system budget since 2001, we are ensuring our refuges continue to be places of awe and wonder as well as economic vitality for local communities across the country."

The report reinforces the travel industry's belief that ecotourism is becoming big business, according to Roger Dow, president of the Travel Industry Association of America, who unveiled the report with the Secretary of the Interior. The study measured the economic impact of ecotourism, large numbers of people traveling substantial distances for outdoor activities like wildlife observation and photography....

The Sacramento National Wildlife Refuge produces \$1.21 in community benefits for every \$1 spent on it—Sacramento Bee, October 11, 2005, "Valley refuges are money magnets."

Proposed alternatives should include analysis of site designs and density reductions that avoid the most egregious of the environmental impacts and confine the units to the north and south ends, with the number of units limited by the size of the existing sewer line capacity.

To the extent that alternatives would interfere with vested development rights, the REIR should consider an alternative that would transfer those rights to an area with fewer natural and cultural resources.

- 20. Please indicate which residential streets will be private and gated and address the issues surrounding this practice, such as emergency access, social/community ramifications, etc. How will monitoring efforts will be conducted if access is not public?
- 21. Please follow CEQA guidelines and mandates to address in detail all possible cumulative impacts especially in light of Placer County's rampant growth and in keeping with CEQA's doctrine to "Consider the cumulative environmental effects of its action before a project gains irreversible momentum."

Examine the impacts of Rocklin's development referred to as the "Summit," potential development at the north end of Clover Valley, and the impacts of Twelve Bridges and Bickford Ranch. Weigh the impacts of the proposed Clover Valley development on water supply, energy, traffic and, most importantly, loss of wildlife habitat connectivity.

- 22. Please address conformity with all NPDES Phase II standards, including but not limited to Hydrograph Modification Management.
- 23. Please analyze the proposed project in light of "Low Impact Development" theories as well as "Smart Growth" principles. The concepts of Low Impact Development have been presented and embraced by many communities.

- 24. Does the City of Rocklin plan to have any affordable housing? Does the City plan to have a citizen workforce in the service industries and/or police, fire, education fields? If so, inclusionary housing must be considered in the proposed Clover Valley development. If not, then traffic impacts from typical upper-end "bedroom" developments must be analyzed with the increase in domestic employees.
- 25. Please analyze the economic costs to taxpayers to provide necessary services to residents of the proposed development—police, fire, infrastructure maintenance, schools, etc.
- 26. Please analyze air quality standards in light of current lack of compliance with federal standards. Apply the standards for air quality in the context of Clover Valley being a natural "bowl" (a depository) as well as being on the receiving end of the Delta currents with all the toxins from the Sacramento Valley.
- 27. Please address the obvious fire danger inherent in grasslands and a valley with vegetation and slopes as steep as found in Clover Valley. Include evacuation plans, the logistics of fighting a fire in the valley, and consider the jeopardy such a development imposes on fire fighting personnel.
 - 28. Please require protection of the historical rock walls as opposed to their "removal."
- 29. Please analyze the time frame and phasing of the proposed development. Will all infrastructures be installed at once? Or will streets be constantly dug up to increase capacities as build out occurs? All utilities should be underground.

The proposed project must analyze whether fees for services and facilities will result in the project paying its own way, both in the short and long term. On a cumulative basis, the REIR should describe whether the proposed development overall is paying it own way or will have a long-term adverse impact on the provision of adequate services in the area.

30. Please analyze and utilize the principles that will be presented in the "Smart Pedestrian Design" workshop that is being sponsored by SACOG, the BIA, and the City of Rocklin on October 29, 2005.

The following relevant comments were submitted for the 2002 Tiered EIR and have been updated where possible. If outdated information is referenced, please substitute current regulatory terms and mandates.

Please conduct a more thorough review of the biological resources at risk. The 1995 CVL DEIR/FEIR failed to mention that the California Natural Diversity Data Base lists (in addition to special status species Cooper's hawk and western pond turtle on site) black swift, California red-legged frog, foothill yellow-legged frog, osprey, and yellow warbler as special status species occurring in Placer County. All of these special status species share a preference for the oak woodland habitat attributes that characterize the CVL site.

Since elderberries are on the property, an analysis must be required for the endangered Valley Elderberry Longhorned Beetle (VELB).

The City needs to address the adverse impacts of increased night lighting and glare on wildlife, especially near the woodlands, wetlands, riparian forests or any known wildlife habitat. New studies have indicated the impacts from night light are much more devastating than previously thought.

Please analyze the concomitant impacts from the proposed project's buildings, fences, streets, pipelines, transmission lines, cars, children and pets on the wildlife habitat value of forested "open space" areas after development of the property.

SPECIFIC REQUESTS FOR ANALYSIS IN THE CLOVER VALLEY DEVELOPMENT

- Please comply with mitigation measure ZMM-3a in the 1995 DIER which requires all development to obtain a new wetland delineation.¹ Since this "large lot" project involves construction of a backbone road and sewer, the proponent should comply with the same survey requirements as placed on the lots, especially where the road and sewer are closest to the creek.
- Please analyze the impacts of loss of all wetlands on the project site. It is not proper to assume that issuance of a Nationwide 26 Permit under the USACE's section 404 permitting authority is the equivalent of a finding that a project will not have a "significant impact" under CEQA. The 1995 DEIR makes it clear that the most recent wetland delineation for the entire project area found at least 25 acres of jurisdictional wetlands on the project site.² The FEIR implicitly recognizes that the Nationwide Permit 26 limitation for the amount of wetlands that can be filled should apply to the Clover Valley Ranch project as a "whole."³
- Please analyze the direct, indirect, and cumulative impacts to steelhead and its designated critical habitat. The United States Fish and Wildlife Service ("USFWS") listed steelhead as Threatened under the Endangered Species Act in June of 1998.⁴ Clover Valley Creek is within the designated critical habitat for this listed species.⁵
- Please analyze the site-specific impacts to the Tricolored Blackbird, Western Pond Turtle, Cooper's Hawk, and any other sensitive species and their habitats as population numbers or their relative distribution could have changed in the project area since the 1995 DEIR.
- Please produce the results of all biological surveys relied upon in the DEIR, including a brief discussion of survey methods, results, and conclusions, as requested in the USFWS' comment letter to the 1995 DEIR.⁶ As explained by USFWS, a mere summary of surveys in the EIR is inadequate.⁷
- Please conduct biological studies at intervals throughout the year, in order to maximize the likelihood of encountering each species during the season most appropriate for accurate identification.
- Please integrate into the "large lot" EIR adequate cumulative impacts analysis of the Bickford Ranch, Whitney Oaks, Twelve Bridges, and other nearby development projects. Please include cumulative impacts to water quality, plant life, wildlife, transportation, and visual

² See *supra* notes and accompanying text.

¹ See 1995 DEIR, supra, at p. Z-8.

At page AA-1, the 1996 FEIR states that "If the subdivision roads and homesites are designed to avoid mapped wetland areas disturbance to these areas could be minimal. . . . If more area is filled, a 404 permit from the US Army Corps of Engineers will be required as will full compensation or mitigation of the total amount of wetlands filled." (emphasis added.) This statement implicitly recognizes that the wetland impacts that must be analyzed in the section 404 permit process are not limited to only the backbone road and sewer, but must include all wetlands that will be impacted by the "whole" of the Clover Valley project.

⁴ See 63 Fed.Reg. 32996 (Jun. 17, 1998) (listing steelhead as threatened).

⁵ See 65 Fed.Reg. 7764 (Feb. 16, 2000) (designating critical habitat)

⁶ See 1996 FEIR, supra, at Appendix 1, USFWS Comment Letter, Enclosure A, at p. 1.

⁷ See 1996 FEIR, supra, at p. AA-1.

resources of each area. The 1995 DEIR's statement that some developments "are expected to contribute to this cumulative impact" is inadequate.

- Please evaluate the oak woodlands on the project site-specifically to determine the highest quality stands and regeneration areas. Please develop and analyze a preferred alternative that minimizes the impacts of the project to the oak woodlands, even if such alternative eliminates development opportunities on one or more of the "large lots" or requires their reconfiguration.
- Please consider site-specific mitigation strategies for native plant species, including protective fencing around the oaks' drip lines and requiring that only native plant species be used in future landscaping projects.
- Please consider the alternative of not developing lots with slopes of 20% or greater. These areas will require cuts of larger than 10 feet and the proposed revegetation mitigation will likely fail due to shallow ridge-side soils. These lots will also present flood control problems and will be susceptible to erosion.
- Please consider mitigation strategies including buffer zones of at least 100 feet for all wetland and riparian areas. This buffer zone will help protect native plant species and wildlife from exotic species, as well as protect the natural waters from project-introduced runoff. This mitigation strategy would appear to require an alternate location for some roads where current locations do not afford an adequate buffer zone for the riparian area, increasing potential discharge of runoff into the creek.
- Please consider all alternatives that eliminate creek crossings over the Clover Valley Creek. Eliminating creek crossings will preserve the wildlife corridor that exists in the riparian creek areas. If bridge crossings are absolutely necessary, please consider an elevated bridge structure that will afford adequate undercrossing for wildlife.
- Please analyze the site-specific, direct, and indirect impacts of fragmenting the existing wildlife corridor, effectively cutting off the ability of wildlife to travel between riparian areas.
- Please consider alternatives to control runoff from the developed site including a retention pond system that will not discharge thermally polluted water downstream.
- Please develop and analyze a preferred alternative that identifies key areas of biological significance and which clearly places each of these areas outside the "large lots" for development.

Please analyze "conservation easement" areas and be certain to place them outside of each of the "large lots." Currently, the proposed large lot map indicates that open space areas will be designated "open space," but these same areas appear to be included on the interior of the proposed "large lots." If areas are known to be set aside for conservation, they should not be interior to any "large lot" development parcels.

⁸ 1995 DEIR, *supra*, at p. Z-12.

Please keep us informed as to all aspects of the proposed Clover Valley Development. The City of Rocklin has a responsibility with the public's trust and a mandate to protect fragile, highly sensitive, most threatened, life-giving, natural resources. Off site mitigation measures are unacceptable. The emphasis for this project must not be on permit avoidance, but more on pollution prevention.

Sincerely,

Mailyn Jayan Marilyn Jasper, Chair

Sierra Club Placer Group

Cathie French Tritel, Director Clover Valley Foundation

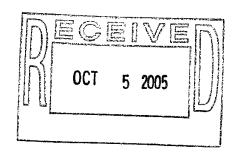
C. French - Ditel

Ed Pandolfino, Ph.D.

Sierra Foothills Audubon Society



SPRINGFIELD WHITNEY OAKS



October 5, 2005

City of Rocklin Community Development Department 3970 Rocklin Road Rocklin, CA 95677

Dear Mr. Mohlenbrok,

I am writing this letter on behalf of the Springfield at Whitney Oaks Homeowners Association and Board of Directors. Springfield is a community of 868 single family homes. Our Homeowners Association has several concerns regarding the Clover Valley Large and Small Lot Project.

The proposed project as submitted will result in an increased traffic pattern. In addition, as this development is under construction, Springfield will bear the burden of increased construction traffic, noise and pollution which are all issues that have an affect on persons who reside in a community where the age of residents are 55 and older.

Presently Park Drive has a designated speed limit of 40 miles per hour, but vehicles most often travel in excess of 50 miles per hour. Springfield is an adult community with five gates opening on to Park. Only two area gates have stop signs allowing for safe egress onto Park. Several of the entrances have limited vision when vehicles egress onto Park due to the hilly terrain. In fact the city was to re-stripe the Park/Crest gate entrance two years ago and to alleviate some of the vision problem, but this has not been done. In addition, the present plan has two proposed entrances on to Park opposite Springfield homes.

The planning Committee and the City Council required all construction traffic to use alternate routes other than Park when building the Whitney Oaks Phase 3 Condominiums-Unit 39&44. The same agreement was granted for the land formerly referred to as Sunset Rancho where construction traffic is to utilize the 65 entrance.

Prior to the formal hearing of the Clover Valley EIR we are requesting that the planning department order a traffic study to examine the egress and ingress issues of the Springfield entrances off Park Drive due to the increase of traffic from the surrounding proposed developments. In addition, as in the first Clover Valley EIR, require all construction traffic and related traffic enter Clover Valley by alternate roads other than Park

We appreciate your consideration regarding our concerns and proposals and look forward to hearing from you.

Sincerely,

Kim Moran, President

Kim Moran

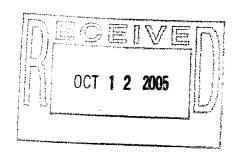
Springfield at Whitney Oaks Board of Directors

Cc: Rocklin City Council



October 10, 2005

Sherri Abbas, Planning Services Manager Community Development Department City of Rocklin 3970 Rocklin Road Rocklin, CA 95677



RE: Clover Valley Recirculated Environmental Impact Report

Dear Ms. Abbas:

Once again, on behalf of Union Pacific Railroad I am writing to oppose the Clover Valley Subdivision General Development project. We continue to object to the proposed project for several reasons that have not changed since our letter of November 17, 2004.

First and foremost is the issue of public safety. The proximity of the project to our rail lines will expose citizens, as well as Union Pacific, to additional incidents of trespass/fatalities. Unfortunately, California has experienced dramatic increases of fatalities by trespass and car/train accidents. While we recognize that there is an elevation rise to the development, this alone would not prevent the accidental or intentional traversing of the slope to the tracks and the subsequent risk of a train/trespasser accident.

Second, the project will be subject to noise and other environmental considerations. This office receives numerous telephone calls and letters from citizens objecting to the train whistles. There has even been an article in the Sacramento Bee specific to Rocklin and Lincoln (enclosed) where residents complain of train noise. The new horn-blowing regulations now require train horns to be blown in one long blast starting 15-20 seconds prior to entering any crossing at all times of the day and night. The whistle may also be executed for stray pets or transients. The whistle, used to warn motorists, pedestrians, and trespassers of the oncoming train, could blast at all hours since Union Pacific is a 24/7 operation. There is also operational noise and vibration to consider. The rise in elevation between the tracks and the development will not necessarily mitigate the effects of the whistle on the residents.

Finally, thought should be given to traffic flow and subsequent congestion when our trains pass through crossings. Blocked crossings are a chronic complaint of

the public whenever residential or commercial interests abut our right of way and ingress/egress is prevented.

Changing the plan to reduce the number of residences and re-orienting the commercial site does not alter our position on this project.

Please accept this letter as documentation of our opposition in the event future litigation should occur.

I am,

Sincerely, WAYNE K. HORIUCHI Special Representative



This story is taken from Placer at sacbee.com.

Residents sound off about train horns

Sleep-deprived hope to establish 'quiet zones'

By Jennifer K. Morita -- Bee Staff Writer Published 2:15 am PDT Thursday, September 1, 2005

Shortly after two o'clock on a recent weekday morning, Lincoln resident Angelo Andriani Jr. sat bolt upright in bed, his ears ringing with the sound of a train blaring its horn through town.

"It's like being in a dead sleep and having your alarm clock go off, but you can't shut it off," Andriani said. "When you're jarred awake like that, it just ruins your sleep."

Andriani and other sleep-deprived South Placer County residents are hoping their cities will apply for "quiet zones." Under a new Federal Railroad Administration rule, communities can silence train horns if additional safety improvements are made at some railroad crossings.

Locomotives are required to toot their horns 15 to 20 seconds before reaching all public railroad crossings. The new rule, which took effect on June 24, allows communities to establish quiet zones where horns are prohibited from sounding.

At a minimum, crossings within these zones have to have flashing lights and gates. In some cases, additional warning devices may be required, such as raised medians, automated horns or photo enforcement systems.

Some Rocklin and Lincoln residents living in newer housing developments that have sprung up near Union Pacific railroad tracks want their city officials to establish quiet zones and end the nocturnal disturbances.

The Andrianis moved into their \$658,000, five-bedroom home in the Lincoln Crossings development in March and are already thinking about moving.

"Since we've been in this house, my wife has been sleeping in another room at the front end of the house because our bedroom window actually faces the tracks," Andriani said. "We spent a lot of money for this house, and this train is totally annoying."

When Kevin Timone first moved into his Rocklin home two blocks from the railroad tracks, the short toots from the passing trains didn't bother him.

Timone speculates that someone or something has angered train operators, "because now they honk one mile before and one mile after" the crossing, he said. "It almost seems like a slap in the face, like they know you're sleeping ... It's forcing us to reconsider where we

live."

Union Pacific spokesman Mark Davis said his company supported establishing the quiet-zone rule as a way to ease the noise pollution in some communities.

In the absence of an alternative warning system, however, train operators have no choice but to sound the horn, he said.

"Unfortunately, horn signalling is something our train crew members feel they have to do," Davis said. "From a train conductor's perspective, it's one of the most helpless feelings knowing you're going to strike a vehicle and that there's no way to stop."

Davis said one reason train horns seem to sound longer is that newer locomotives have electronic whistles instead of manual ones that allow conductors to control air pressure.

Davis also dispelled the idea that train conductors are purposefully trying to roust residents from their slumber.

"Our train crew members live in the areas where they operate," Davis said. "They're probably your neighbors, and you just don't know it."

Last month, the Sacramento City Council approved a 24-hour quiet zone along Union Pacific railroad tracks between West El Camino Avenue and Meadowview Road.

In 2003, the city of Roseville adopted a quiet zone and installed a \$170,000 automated horn system at its two public railroad crossings for a two-year trial.

Instead of the train conductor blowing the whistle, an automated horn at the crossing itself will sound as a train approaches. Such a system is designed to reduce noise by directing the warning sounds to vehicles waiting at the crossing.

The experimental system has been approved as a permanent safety feature, said John Sprague, Roseville's assistant city manager and community development director.

"It's not unanimous, but we've had extremely positive feedback," Sprague said. "I would say the vast majority of the folks we've heard from throughout the surrounding neighborhoods believe it's made a substantial improvement."

Lincoln Mayor Tom Cosgrove, however, said when city staff members researched automated horns, they found it would cost as much as \$250,000 to modify each of the five crossings in town.

"So we haven't really pursued it," Cosgrove said.

Lincoln's mayor, who lives a quarter-mile from the train tracks, was sympathetic to residents' concerns.

Before he bought his house, Cosgrove visited the neighborhood at various times of the day to listen to the train noise.

"But it didn't prepare me for the day we moved in," he said. "We have a second floor with a direct line of sight to the tracks, and we could hear the whistles very, very well from there."

Eventually, Cosgrove said, he adapted to the noise.

"It's really nice to be able to say we're going to have a noise-free zone," Cosgrove said. "But it's awfully expensive to make something like that happen."

Rocklin officials could not be reached for comment.

Meanwhile, Lincoln residents such as Jim Pirkle say they're willing to work with the city to establish a quiet zone by signing petitions or researching the issue.

"Sacramento and Roseville are doing something about it," Lincoln Crossings resident Pirkle said. "It should only be a matter of time before Lincoln does something, too. At least, we hope so."

QUIET ZONES

For more information on quiet zones, view the following Web sites:

Federal Railroad Administration

www.fra.dot.gov

Union Pacific

www.up.com

Click on "general public," and there will be a link to information about the Train Horn & Quiet Zone Rule

About the writer:

 The Bee's Jennifer K. Morita can be reached at (916) 773-7388 or jmorita@sacbee.com.

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October 3, 2005

Dear City Council Persons,

I have lived in Rocklin for 27 years in a 35 year old home on Clover Valley Road in Rocklin. My daughters were raised on a street with no sidewalks or curbs among massive healthy old oaks, wild creatures of all types, including rattle snakes, and had the freedom to play in the stream and roam the gentle hills freely.

Since then the population has a little more than doubled, especially in the last ten years. If this growth continues at the current rate it will DOUBLE in three more years to something around 80,000 people! People moved from "So Cal" to the bay area fired of the traffic jams and "TMP" (too many people). Then when developers gobbled up the bay area they began in Sacramento. Now Rocklin is being developed out to Auburn, over to Lincoln, through Loomis, (although their council seems to have a good eye for growth control), Standford Ranch is out-of-control building, the entire corridor from the Galleria to Lincoln is FOR SALE. Every beautiful grasslands is being replaced with more homes, yet another mini mart or Wal Mart, no unique stores, the same ones, some mini malls even empty. Cars, cars everywhere! Where does it stop? It stops in Clover Valley. This beautiful little piece of God's country should be saved for us all. Not just the animals, the ecosystem, the heritage 300 year old trees, the Indian Heritage but for All our quality of life. I am asking you as a fellow citizen of this town<PLEASE SAY NO TO THIS DEVELOPMENT> You can do that. Let's make the valley a place people will want to come to Rocklin and see and experience.

They saved Central Park, didn't they and what a piece of real estate that is. Please look to your heart. This is NOT about money, its about consciousness to the earth and your fellow man. We elected you in belief you will do the right thing, do it! Thank you for what I know you can do for us,

Suzanne

Wednesday, October 05, 2005

Some of the things that I am most saddened by here in Placer County are the total disregard for the environment. I have never seen such poor community planning. The entire area has been designed for vehicle dependence; it is one of the most anti pedestrian, anti bicycle and definitely anti public transportation communities that I have ever lived in. This is one of the sunniest places in California and there is hardly a solar panel to be seen. Builders think that a 5 bedroom house is a normal size family home. There is no thought given to the conservation of our quickly depleting natural resources, only to how big my house is and how big my suv is.

A four wheel drive suv is not a commute car!!! They are for recreation and work!!!

There is nothing left as it was before contact. Everything that was offered freely and this society has taken by force, you have destroyed. The land has all been taken and sold, turned and flattened, the trees have been cut, water poisoned and it only took you 200yrs. What will you do with the next? Will you continue on this path of greed and destruction or will you change? Have you learned anything yet?

There is a deep sorrow that I carry with me every place I go; it is for this land, a gift from creator given to us to care for. Before you came it had everything that people needed and more. It provided all things for us, now it seems that it provides nothing, we have to have more and more. This land means nothing to you. The stones, the animals, the people that were here, there love for this land, the trees, and the water mean nothing. Do you have to bottle and sell every think that you see, it was free.

What do you see when you drive in your car? Do you not imagine what it was like before you were here? Can you not see all of the dead animals on the side of the road, the hawks closer and closer to the roads, the dead rivers, and the air pollution; don't you think that it could be different if we worked together as a community?

How can you as a city counsel make plans for land, for the remains of our ancestors, for a sacred site, for the last piece of open space, when you have irresponsibly developed Rocklin how it is? You have developed the charm out of this city. There is no charming downtown or streets with shops to walk down, there is no beauty left, no culture, no open space. To counsel is to impart wisdom, how can you not care! I am still at 39years Old shocked and the total disregard for this land, the environment, the health of our children and its indigenous people that I am ashamed sometimes to be American.

Get it together.

Infany adams 916/791/0203

Rocklin Resident Statement Opposing Clover Valley Urban Development

- My personal interest in this is that Clover Valley exploitation will degrade Rocklin property values in general, and therefore my property also, more specifically because of it's close proximity to Park avenue. Development of it as a wildlife preserve, or leaving it alone, will enhance my property value. I live about 100 yards from Park Avenue in New Rocklin.
- In general, I'm very opposed to wetlands destruction and groundwater pollution with persistent organophosphates and organochlorines coming from suburban bathrooms (nail polish, eyebrow remover, bathroom cleaning solvents, etc.). Here's a year 2004 quotation from John Alspach PhD, a Dept. Of Pesticide Regulation Evaluation Specialist. He says, "Big chemical companies push through anything no matter how long-term toxic it is if they push long enough and hard enough". I know this true, I worked at this CalEPA agency until recently. I'm now with CalTrans.
- Buzz Oates and company doesn't need the money.
- Lawyers don't need the money.
- The brokerage/real estate industry doesn't need the money.
- International investors have no concerns whatsoever about how much degradation we have here in Rocklin, whereas I do have a vested concern in it.
- I don't want to be fighting traffic gridlock every morning on the way to work. Park Avenue was designed for a heavier load than it supports now, but converting it to a highway 90 alternate is too much!

Thank you.

John Armstrong 6517 Powder Ridge Dr. Rocklin, CA 95765

Clover Valley Project





David Mohlenbrok, Senior Planner
City of Rocklin Community Development Department
3970 Rocklin Road
Rocklin, CA 95677

OCT 7 2005

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Haladadlaladladjaldkaladdla

Louis and Dorothy Arredondo 1911 Harvest Ct. Rocklin, CA 95765 916.663.6218

September 18, 2005

David Mohlenbrok City of Rocklin Community Development Department 3970 Rocklin Road Rocklin, CA 95677



As members of the Rocklin Community, we are expressing our support of and the importance in preserving Clover Valley, an astonishing treasure in this pristine valley. We have several concerns and comments related to the possibility of future development in Clover Valley.

We understand that the road building that will extend from Sierra College Blvd, through Clover Valley will connect to Park Drive. The amount of traffic per day on this new road would be about 16,000 cars per day, which would be the equivalent of a Hazel Ave in Sacramento. This new bypass will be a new Highway 80 from Park Ave, and will be a way to connect to Highway 65, cutting through Stanford Ranch and Whitney Oaks. The result of this new development will be increased air and noise pollution.

We understand that an additional 1.7 miles of off site sewer lines are proposed to be built to support the increase in building of more homes. These additional sewer lines impact the streets of Rawhide, Midas, Argonaut and Union. Construction may last from 4 to 9 months or longer. If impenetrable layers of rock are found, blasting may be required. Clover Valley would have to be torn up to build sewer lines resulting in even more trees and habitats being destroyed.

Building in this valley would cause disruption to wildlife. The removal of 7500 oak trees would be expected if construction goes through this valley. The endangered Swainson Hawk would suffer as well as the Western Pond Turtle and Steelhead.

There are unknown flood/water quality/water storage implications to our community due to wetland, tree, and vegetation removal. Possible flooding and soil erosion may occur due to construction and disturbance of Clover Valley and Antelope Creeks, which could impact those living on Rawhide, clover Valley and Midas.

We are asking that you consider our concerns and support our position as community members in the value of preserving Clover Valley.

Thank you,

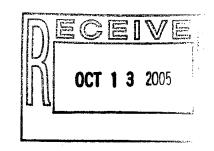
Louis and Dorothy Arredondo

STEPHANIE AUSTIN P.O. Box 602 PENRYN, CA 95663

PHONE/FAX (916) 663-3086 email - StephanieAustin@cwnet.com

October 12, 2005

Mr. David Mohlenbrok Planning Department City of Rocklin 3970 Rocklin Road Rocklin, CA 95677



Subject: Clover Valley Notice of Preparation

Thank you for the opportunity to comment on the NOP of the Clover Valley Recirculated EIR. I am requesting that you respond to my following specific concerns:

Please analyze -

- The environmental impact of the slope and drainage easements that "would be created within the open spaces . . . ".
- The funding for long-range monitoring, and additionally the safeguards provided against HOA inability or unwillingness to monitor and/or maintain easements.
- The posting of substantial bonding to insure that mitigation measures will be fulfilled, even with insolvency issues.

Please specify impacts on oak trees -

- The number of each of the various oak tree species that will be removed as a result of the entire proposed project, including but not limited to secondary "takes" (or kills) from damaged drip lines, disruption of soils, undercover, etc.
- With special emphasis on Blue Oaks, please discuss, study and analyze the impacts of their removal.

Addtionally, I would like to remind the representatives of the City of Rocklin that they were elected by the people of Rocklin to represent the people of Rocklin, to protect and, if possible, improve our lifestyle. While the developers might be making financial contributions (to roads, community centers, churches and/or elections), they are not your constituents and you have not been elected by them.

12th October 2005 2ND PAGE OF TWO

The proposed Clover Valley project is quite obviously not supported by your constituents. The hundreds, if not thousands, or local residents who have protested this development from the very beginning are not being paid for their time, or their efforts, or being reimbursed their personal expense. We have no financial gain by saving Clover Valley. We speak from our hearts.

As our representatives you are the only buffer we have between the developers and the destruction of Clover Valley. We request that you listen to your hearts – and your constituents. It is never too late to do the right thing.

I look forward to all further information on the proposed Clover Valley project.

Sincerely.

Stephanie Austin

ford Octoberat

Mr Havor Moblen Goh City & Pahlin Saning Dost.

Chose Cacley NOP

Re: The destruction of Clover Valley

Aside from losing forever a magnificent open space in Rocklin, the impact on us from the increased air pollution and traffic will be significant. Has anyone happened to observe that the deepening lavender tones in our sunsets are already a result of pollutants in the air? And how are we going to cope with the ADDITIONAL traffic congestion that will be generated? We are already burdened with both these conditions.

Another major concern is adequate validation on the proposed (destructive) project's negative impact on our local groundwater supply and its quality.

And what about the importance of Rocklin's historical background? Native American residence in Clover Valley for 7000 years has left it rich in artifacts and spiritual significance. We would be losing what the National Registrar of Historic Places has deemed an "Archeological District."

Has anyone considered an initiative to preserve this last available natural open area and watershed as a memorial park? Once this area is otherwise "developed", there will be nothing left of Rocklin, indeed, but masses of paved land.

Louise Bachtold

Louise Bachtold 2400 Cody Court

Rocklin, CA 95765

Clover Valley Project

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

OCT: 1: 4: 2005

COMMENT FORM

eceived, please provide the following information. Thank you.
Name: Thomas S. Ball
Address: P.O. BOX ZOS RESCUE, CA
Organization: STUDENT
Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.
I Belive That This OPEN Land is
ESSENTIAL TO THE CITIZENS: BECAUCE THERE IS TOO MUCH UMBAN SPRAWL IN MODERN DAY SOCIETY, WE NEED TO DRESERVE as MUCH VATURAL
Aveas as possibal for Healty Rechation and Being Close to NATURE.
$oldsymbol{\epsilon}$

(Prior to mailing this form, please fold form so that address on back is clearly visible, and attach necessary postage)

Clover Valley Project

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING **COMMENT FORM** OCT 1 3 2005 To be added/corrected on our mailing list and to document the author of comments received, please provide the following information. Thank you. Barker Name: Mia Sacramento CA Organization: Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.

(Prior to mailing this form, please fold form so that address on back is clearly visible, and attach necessary postage)

Clover Valley Project

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING OCT 1 4 2005 COMMENT FORM To be added/corrected on our mailing list and to document the author of comments received, please provide the following information. Thank you. Name: Toni Behil Address: Ps Box 1417, KorestAll CA. Organization: Sierra college, Csus Please provide us with your written comments on the scope of the EIR by 5:00 pm. October 14, 2005. - The asethics of the foothills should be taken into account. - The additional traffic thru Roseville and needs to be considered grew up here and there is a lot more to this area than Just building more homes, - This land is a local heritage

(Prior to mailing this form, please fold form so that address on back is clearly visible, and attach necessary postage)

To:

David Mohlenbrok, Community Development Department, City of

Rocklin

From:

Jo Bentz

Date:

October 10, 2005

Subject:

Comments on City of Rocklin NOP for Clover Valley Project

OCT 1 7 2005

These comments are provided for the NOP for the recirculated EIR (herein called the EIR) for the Clover Valley development project:

Submitting Comments-

The proposed Clover Valley project as described in the NOP will have significant, unmitigable impacts on a number of resources including biological, hydrological, and cultural. The project also has potential for significant unmitigable impacts on traffic, scenic resources, water quality, and aesthetics. This project is large and complex and involves negative impacts to so many different resources at so many different levels, the comment period for oversight trustee agencies should be extended to allow for site visits, careful analysis, and a full determination of impacts.

Scoping Meeting-

One open house/drop in style scoping meeting for a project of this magnitude as described in the NOP is inadequate. I believe it would be more appropriate and of greater value for the public and for the responsible and trustee agencies to be able to have a scoping meeting at the site. I understand that access to the property is limited, but certainly an on the ground meeting overlooking the site and attended by staff from Community Development of City of Rocklin to answer questions about the layout of the proposed project should be conducted. By not allowing a forum for a serious discussion of issues at a scoping meeting and no scoping meeting at the site, you deny the public and the responsible and trustee agencies the right to see firsthand the magnitude of the impacts of this project.

Local Setting, page 2-

To call this magnificent, pristine, biological rich property " $622 \pm vacant$ acres" is a misrepresentation of the truth and needs to be corrected in the EIR. I recommend that additional language be inserted into the setting section that provides a more accurate description of the property. The description of the setting needs to include the natural condition of the canyon, to describe the pristine, undisturbed, and intact riparian corridor, Clover Valley Creek, the abundant, biologically rich wetland environments, and the steep sided upland slopes covered in grasses and oak woodland. The setting should also state that the property occupies an entire canyon rim to rim which encompasses a complete watershed and biological resource island in an area surrounded by moderate to high

density residential development. This is no ordinary block of "vacant" land and to omit a more accurate description of the property in this section is inaccurate and misleading.

Project Description-

I am against allowing an encroachment waiver to allow the Nature Trail Way within the 50-foot creek setback in two places. The creek setback needs to be strictly enforced and possible widened because of the potential for significant degradation of wetlands and the creek by storm water runoff, earth moving activities, the building of roads and creek crossings, and the creation of impervious surfaces above Clover Valley Creek.

Proposed Land Use-

Bottom paragraph, page 4, there is an omission of the construction of a storm water conveyance system in the list of needed construction. In addition to the analysis of an off-site vs. and off-site sanitary sewer system, there should be an analysis of an off-site (pumping storm water up out of the canyon) vs. on-site storm water conveyance system due to the unavoidable degradation of Clover Creek and wetlands from contaminated and sediment laden storm water runoff from the approximate 256± acres (see land use table) of impervious surfaces created by the project.

Second paragraph, page 5-

There is a potential for erosion of sediment into the pristine wetlands and into Clover Valley Creek by allowing the "temporary stockpiling of the soil on –site for future use." Who will be responsible for managing the stockpiles and covering them for winter? Who will ensure that the soil in the stockpiles does not run off into the creek? Define the length of time described as "temporary."

Third paragraph, page 5-

A tree survey must be completed and available for public review so that the project can be modified to decrease the significant (a quarter of existing trees on the property) proportion of trees to be cut. The actual number of trees to be cut, although important, is not complete information. Cutting of trees in this canyon will fragment bird and wildlife habitat and cover as well as significantly change the scenic character of the canyon. Tree cutting and terracing will cause unstable slopes and the potential for landslides or erosion into the sensitive and pristine wetland and riparian areas. I recommend that the EIR present an alternative plan for reducing the number of trees to be removed by greatly reducing terracing of the canyon and decreasing the number of residential lots from the current proposal.

A detailed tree survey, report and map needs to be prepared by a certified arborist giving the location of each tree or groves of trees to be removed, the species of tree, the slope, and the diameter of tree at breast height. No trees should be removed on slopes greater than 30%, even if the slopes are later to be terraced. The tree report needs to be provided

to the public for comment and should show the footprints of the houses, roads and other structures in relationship to the location of existing trees. No tree or vegetation removal should occur within the 50 foot setback from Clover Valley Creek for any reason in order to maintain the water quality, fish habitat (trees and other vegetation provide shade to Clover Creek) and invaluable wildlife habitat and movement corridor along Clover Creek.

To my knowledge this area has not previously been cut and has an undisturbed canopy of oaks representative of how California used to look at the turn of the century. Therefore, every effort needs to be made to reduce the unacceptable number of trees proposed for removal at this property. The EIR should evaluate the benefit of preserving contiguous areas of multigenerational oaks as opposed to saving only the largest, mature, "trophy" trees. Heritage trees should be identified, and tree replacement rates should be employed to mitigate the losses of native species. Replacement trees need to be native species and rates should be at least two or three to one, depending on the size and age of the destroyed tree.

Land Use-

This property has immense value as scenic Open Space. It is an intact, pristine, ecological island surrounded by urban development. There needs to be a discussion in the land use section to evaluate if there is another area (opportunity) like this in Rocklin that is suitable to provide as an Open Space Preserve for the residents of Rocklin. The creation of an Open Space Preserve in Rocklin benefits the community and all future residents of Rocklin. Open Space increases property values within the community and would make Rocklin a more desirable place to live. An Open Space Preserve of this quality would become a selling point for the Rocklin Chamber of Commerce. An Open Space Preserve can be combined with an educational center to teach the community and tourists about the indigenous people who used to live here. There are many archeological sites on the property which need to be protected forever.

Providing a valuable, passive recreational, Open Space area for the residents of Rocklin and surrounding communities should be considered as an alternative to development in the EIR. The benefit of Open Space in a dense urban city like Rocklin far outweighs the benefit of adding more residential development. What are the cumulative negative impacts of developing one of the last remaining intact and untouched biological rich canyons of the Sierran Foothills?

This property is a unique gem and natural treasure that needs to be preserved for generations of Californians to come. The property provides wildlife habitat and scenic vista on par with similar properties that that have been acquired for passive recreation and environmental education by such non-profits as the Nature Conservancy. The land occupies a relatively narrow, steep-sided canyon that is unfit for a development proposal of this scale. The geographic setting of the property, a canyon on the outer edge of Rocklin, makes it a perfect candidate as an urban growth boundary, community separator,

and greenbelt between the dense urban development in Rocklin and rural areas like Loomis. The EIR should address the benefit of this land as a community separator.

Aesthetics-

The impacts on aesthetics due to the development of this raw, biologically rich land into tract housing on cut terraces is a lost cause no matter how much mitigation you throw at it. There is no way to mitigate the significant and unmitigable loss of aesthetics with this project. The use of "rock fascia instead of masonry" or concerns about "lighting standards" for 550 residential units and 46 acres of roads on a property where no houses or roads currently exist is a band aid that will have no real impact on aesthetics.

The City of Rocklin will have to assume significant impacts in this section with no adequate way to mitigate. As you already are aware, spanned bridges should be used for all creek crossings, as culverts remove part of the creek bed and cause permanent alteration of the stream channel, restrict natural meandering, natural flow patterns, and result in permanent removal of the natural stream bed.

Terracing of the slopes is a major issue in this section. I would like to see some 3-D computer graphics in the EIR or presented at a public meeting to see what this development will look like after the terracing and removal of more than 7,000 trees. Why don't you show a picture of that at one of your scoping meetings?

The aesthetic impacts of this project are significant and unmitigable and this should be plainly stated in the EIR.

Transportation and noise-

Roads in a presently roadless area? A two lane freeway (Valley View Parkway, love the name) over one of the most beautiful canyons I have ever had the pleasure to look at. Go ahead and analyze this all you want, but the **no project option** has the least impacts and all other choices are simply unthinkable. What will the addition of roads, overpasses, lights, and noise have on the wildlife in this canyon?

Cultural resources-

I will leave this section to the professionals who will tell you that these archeological sites need to be preserved for future generations. There is sacredness to this land that makes it completely unsuitable for development. It is not appropriate or the right political climate to be paving over Native American ancestral sites.

Biological Resources-

The negative impacts to wildlife, wildlife habitat, wildlife corridor and wildlife movement due to this proposed development will be significant. Areas of greatest concern for disruption are the riparian corridor, the wetlands, and the oak woodland and

grassland habitat. These areas provide year round cover, food and water for wildlife on this property. In the EIR, this property needs to be recognized as a unique intact watershed and ecological island and the importance of the wildlife habitat value should not be underestimated. In the previous EIR, impacts to wildlife were inadequately addressed in slightly more than seven pages. Impacts to wildlife habitat in the 1995 draft EIR were determined to be significant and unmitigable.

The Biological Assessment needs to be performed by a licensed professional who is a biologist and has a broad depth of experience working in the Sierran Foothills. The Biological Assessment will have to accurately reflect the pristine quality of the property and the rich and diverse biological significance of the riparian, wetland, oak woodland and expansive grassland environments. The biological assessment should document the property's use by migratory bird species. The biological assessment should be based on more than one field inspection by the developer's biologist, preferably one in the spring (for wildflowers and nesting birds) and one in the fall.

Audubon Society members should be allowed to complete a bird count in the fall and spring on the property to collect baseline information since they are experts in identification of birds and can add valuable information to the EIR. Special attention should be given to identification of migratory birds, raptors and waterfowl which are all abundant on the property at different times of the year. This is why multiple site visits and bird counts by Audubon are essential. For instance, only two sightings of Cooper's Hawk, a species of special concern, were made in field surveys in 1993 and 1994, even though the hawk is known to live at the property. Audubon should also be allowed to access the property prior to construction phases to identify bird and raptor nests.

According to State Clearinghouse, it is the responsibility of the lead agency, City of Rocklin, to distribute the NOP to the necessary federal agencies, in this case Army Corp of Engineers, Fish and Wildlife Service, and National Marine Fisheries. These agencies should have been notified of this project. If they were not, this may not be considered adequate notification according to CEQA requirements.

Opportunities for on-site field inspections should be made for all regulatory agency personnel including Fish and Game, Fish and Wildlife, the Regional Water Quality Control Board, the Army Corp of Engineers, and National Marine Fisheries. If access to the property is denied to trustee agencies, the CEQA process should be considered invalid.

All elements to support continued fisheries of the creek should be identified in the EIR. Clover Creek supports Steelhead and rainbow trout and other important aquatic species.

A wetland delineation study needs to be completed at this site and reviewed by Army Corp of Engineers and the Regional Water Quality Control Board. Both seasonal and federal jurisdictional wetlands need to be identified and mapped.

Because significant disruption of wildlife habitat will result from construction of this massive project, pedestrian paths (the "Nature Trail"), bike trails, and "public use areas or parks" should be set well outside the riparian and wetland areas. The riparian and wetland areas provide the most valuable habitat for wildlife cover, food, and wildlife movement. I recommend that to mitigate for the disruption and destruction of wildlife habitat in other areas of the site, there should be an even greater setback (greater than 50 feet) from the sensitive riparian and wetland areas for public uses, roads, trails and structures. No waivers should be issued for encroachment into the setback areas, especially for public access or roads which will bring the public into the most sensitive areas and lead to an increase in the disturbance of wildlife with noise, trash, and dogs.

A setback needs to be determined in the EIR for the wetlands. The current setback of 50 feet for Clover Creek may need to be increased to mitigate for impacts on other areas of the property, such as tree removal. Site specific characteristics such as the width of the floodplain, which may extend greater than 50 feet, need to be taken into account and protected within a greater setback requirement. Fifty feet may not be an adequate setback when the creek is swollen and flooding with winter rains.

Clover Creek should be left in a natural state and not channelized, buried from daylight, or altered with concrete or riprap. Natural meanders, the floodplain, and wetland areas need to remain intact and undisturbed. Creek crossings should be reduced or eliminated unless absolutely necessary. No culverts should be used for creek crossings, only spanned, arch type bridges to allow preservation of the natural creek bottom and the ability for natural meandering of Clover Creek.

The entire property is currently used by wildlife. As mitigation, contiguous areas that will not be developed need to be preserved as migration corridors throughout the entire project area. More than one migration corridor is needed and the corridors need to connect to allow passage for wildlife to reach cover, water and food sources. Wildlife movement corridors should extend from canyon rim to rim and from one end of the canyon to the other. There should be no roads, obstructions, or fencing of any kind in the riparian areas, wetlands, and oak woodland grasslands preserved as wildlife migration corridors. If fencing is necessary in other parts of the project site, only wildlife friendly fencing should be allowed. Fish and Game can give recommendations on the construction of fencing that is wildlife friendly.

The September 1995 Draft EIR identified species of concern at the property. New biological and aquatic surveys must be completed by competent, registered professionals since more than 10 years have passed since the last EIR and the information is outdated. Also, there may be new listed species on the property that were not observed or not listed at the time of the last field surveys and biological reports.

There should be no vegetation removal within the riparian setback for Clover Creek and the wetland areas. Vegetation provides cover and food for wildlife. Trees provide shade needed for maintaining a healthy aquatic habitat and keep water temperatures cool. Even trees that are located at quite a distance from a creek may provide a benefit by shading

riparian areas (early morning and late afternoon) and keeping water temperatures cool for fish and other aquatic species.

Tree removal, especially oaks, is a significant negative impact for this project. Oaks provide raptor and bird nesting and roosting sites. Acorns are an important source of food for deer, squirrels, woodpeckers and other species. As mentioned before, there needs to be an effort to mitigate the loss of oaks. Contiguous areas of multigenerational oak woodland should be preserved, not just trophy oaks on private lots. This will help to mitigate for wildlife habitat and movement corridor fragmentation, which is a significant negative impact of the proposed project. Dead wood, or snags, provide an even greater benefit for wildlife and should be left to remain and not cut down in an attempt to "park up" the property.

Roads and creek crossings should be kept to a minimum. I propose that the number of roads and creek crossings be reduced in the current proposal.

The quality of the seasonal wetlands at this property is high. Destruction or impairment of these high quality wetlands should not be allowed. The use of replacement wetland mitigation banking is not appropriate at this location because there is no replacement wetland in this area that can match the quality of the wetlands that currently exist in Clover Valley.

Geology-

This narrow canyon is unsuitable for development and requires major terracing to create suitable building sites. Terracing of the steep slopes and the extensive grading of the site will forever disrupt the natural appearance of the site, disrupt the soil profiles and affect the way that water flows over and through the canyon. The terracing and grading proposed for this project has the potential to create unstable slopes throughout the project area, landslides, excessive erosion and long term sedimentation problems.

Staging areas for stockpiling of what presumably will be massive amounts of soil will need to be delineated away from sensitive environments and the use of the staging areas must be strictly enforced. Please define in the EIR the estimated amount of time soil will be stockpiled "temporarily" at the site for each phase of the project, 3 months, 6 months, 3 years?

Hydrology and Water Quality-

The negative environmental impacts with regards to changes in hydrology and water quality are some of the most significant and severe impacts of the entire project. Storm water issues for the proposed project are huge. There is no possible way to terrace slopes, extensively grade the site, and construct impervious surfaces for 200 acres of residential development, 50 acres of roads, and 6 acres of commercial development without significant, unmitigable impacts to water quality. There is no other place for storm water to go in the canyon but down to the most pristine and environmentally

sensitive environments in the project site, Clover Creek and the wetlands. Culverts for roads or trails that cross or are constructed next to Clover Creek will pose an especially big increase in erosion and scouring. Creek crossings and trails should be eliminated or reduced from the current proposal to reduce impacts due to culverts.

Storm water runoff to Clover Creek will increase the peak flow, cause scoring of banks, deepen channels, and degrade or destroy fish and aquatic habitat in both the creek and wetlands. The huge volume of storm water which will be generated by this project has the potential to cause localized flooding in the canyon and in areas downstream of the canyon.

Storm water discharges will be polluted with sediment as well as urban contamination, such as gasoline, oils, fertilizer, dog feces and trash, to name a few. However, the largest pollution problem will be sediment to the surface waters of Clover Creek. Storm water discharges to surface water will result in degradation of water quality in Clover Creek and the wetlands and there is no way to adequately mitigate the impacts. Although filters and sediment traps could be placed in storm drains, the use of these devices would not eliminate the problem nor substantially decrease the pollution and trash to surface water. Placing dams or detention ponds in or near Clover Creek will result in siltation, pollution, slowing of water which will result in less aeration and increased algal growth, and a rise in the temperature of this free flowing creek. All of these effects will degrade the creek and wetland environments that currently support a robust and diverse group of aquatic species and mammals.

Will the City of Rocklin allow dredging to clear the channels and detention ponds of accumulated sediment? Will levees have to be constructed to keep floodwaters from excessive storm water discharges from overflowing the natural banks of this small creek? Clover Creek and the wetlands are not large in scale and they in no way can handle the amount of storm water runoff that would be generated by this development project.

The creation of storm water detention ponds and dams in the bottom of the canyon within the riparian zone is unacceptable and should not even be suggested as an option. Off stream detention ponds need to be considered. The best option for storm water management is to require that all the storm water be pumped up out of the canyon into a storm drain conveyance system within the Whitney Oaks Project. This is the only acceptable alternative and this alternative, although more expensive than allowing the dumping of storm water into the creek, is the only alternative that can completely mitigate the storm water impacts.

Currently, Clover Valley is a recharge basin that allows percolation of rainwater to surface water and groundwater. The permanent disruption of the natural hydrology of the canyon due to terracing, grading and tree removal will permanently alter the way water currently infiltrates slowly through canyon soils to groundwater and surface water. The natural filtration process will be lost as a result of this project and this in turn may result in degradation of water quality and quantity in both surface water and groundwater. These potential impacts need to be addressed in the EIR.

Discussion of Cumulative Impacts-

In the discussion of cumulative impacts, the EIR needs to evaluate the statement below taken from pg. AA-3 of the Draft September 1995 Clover Valley Lakes EIR-

"The riparian forest and aquatic community of Clover Valley Creek is a highly valuable wildlife resource, and a habitat type of increasing scarcity in the Sierra foothill region and in California."

Discussion of alternatives-

The NOP states that the No Project Alternative "may be analyzed." An alternative of **no project** must be evaluated in the EIR. By approving this project, the City of Rocklin faces the sole responsibility for assuming many, negative, significant and unmitigable environmental impacts on a property which is a rare gem and an environmental treasure in the State of California. This project is highly controversial because the public is aware of what they will lose for the public benefit of more dense residential development in an area characterized by sprawl. This project is in the wrong place at the wrong time. I predict the City of Rocklin would regret approval of this project for years to come.

As the lead agency for this project, the City of Rocklin Community Development Department is mandated by CEQA to implement feasible mitigation measures or alternatives to reduce or avoid the significant environmental consequences due to this project. I believe that is an impossible task unless the No Project Alternative is adopted.

Thank you for allowing these comments-

Jo Bentz

9990 Graton Road

Sebastopol, CA 95472

To:

David Mohlenbrok, Community Development Department, City of

Rocklin

From:

Jo Bentz

Date:

October 17, 2005

Subject:

Comments on City of Rocklin NOP for Clover Valley Project

I would like to amend the following comment to previous NOP comments I sent to you dated October 10, 2005:

In the EIR, it needs to be clearly stated how all phases of construction will conform to the requirements of the Federal Migratory Bird Act. Who will be responsible for surveying migratory bird and raptor nests during every phase of the project within ½ mile of construction sites? Will reports be prepared on the nest surveys? Will the reports be submitted to a trustee agency for review?

Nests cannot be destroyed once eggs are in the nest, nor can migratory birds be harmed or killed. Clover Valley has a great abundance of bird life and provides optimum habitat for nesting. What methods will the applicant use to comply with the Act? Compliance with the Migratory Bird Act for all phases of the project and construction of the Valley View Parkway overpass needs to be addressed in the EIR.

Thank you-

Sebastopol, CA 05472

October 14, 2005

Mr. Dave Mohlenbrook City of Rocklin Planning Department 3970 Rocklin Road Rocklin, CA 95677

Re: Recommendations on Proposed Scope of the Clover Valley Lakes Environmental Impact Report

Dear Dave,

Following are our recommendations and comments on the proposed scope of the Clover Valley Lakes Environmental Impact Report (EIR).

Aesthetics

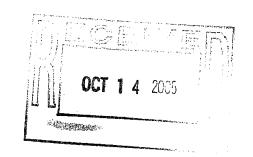
The existing visual environment is open space and natural. The project proposes to convert an intact natural environment into an extension of Rocklin's already pervasive urban environment with lights, traffic signals, road cuts, signage and other visually intrusive elements. The City should disclose in its EIR, using detailed computer based visual simulations, the proposed visual impact on regional intactness, unity and vividness. Views from Sierra College Boulevard, Park Drive and other important public and private vantage points should be conducted (see Bickford Ranch EIR for an example).

Conversion of the existing visual environment to urbanized landscape is a significant and unavoidable impact of urban development. It will require override by the City Council, a Statement of Findings of Fact and Statement of Overriding Considerations. The City should seek to maximize design requirements and restrictions to minimize this impact on the citizens of Rocklin.

Traffic

The EIR should discuss signalization needs at Sierra College and Park Drive, relative costs, how these improvements will be funded and by whom. The current scope does not propose to discuss this element or how and to what extent the Clover Valley Project (CVP) will mitigate its contribution to regional traffic impacts. The EIR should also predict and disclose the incremental increase in traffic accidents and potential fatalities that will result from increased traffic on Sierra College and Park Drive. The EIR should specifically predict and disclose the increased risk of accidents and fatalities in proximity to the existing schools and parks along Park Drive.

The traffic model should account for the development of Bickford Ranch, Sunset Ranchos, and further build-out of the Highway 65 corridor and how these will contribute



to increased traffic flow between Highway 65 and Highway 80 on Park as well as tributary residential streets throughout Stanford Ranch.

Air Quality

Diesel exhaust is a known human carcinogen and the California Air Resources Board is currently working to regulate diesel emissions. Summertime air quality conditions in Rocklin frequently exceed the federal smog standards.

In the Valley. By virtue of its unique topography (a single valley three miles long) Clover Valley creates its own unique micrometeorological conditions. Most evenings of the year a cool river of air flows down the floor of the valley from its upper reaches to the southern entrance. With the proposed advent of the Clover Valley parkway and 16,000 + auto and truck trips a day ascending the two 12% grades out of the valley, plus the loss of mitigation by removal of 8,000 trees, auto and diesel exhaust will become more pervasive in the valley and will be concentrated in the river of cool air that becomes the only air supply for current valley residents. The EIR must thoroughly disclose the predicted human health impacts to existing residents, in particular the increased cancer risk.

Operational Mitigation. Substantial daily diesel emissions in Rocklin from multiple construction sites and aggregate mining operations in western Rocklin during the summer of 2005 were observed; visible thick plumes of black diesel exhaust were transported during the hot summer months via prevailing winds to area residents in Breen and Whitney Oaks neighborhoods. Existing air quality conditions in Clover Valley and nearby residential developments should be addressed using site-specific data, not regional data that tend to underestimate and minimize localized air pollution events. Operational mitigation measures (shutting idling engines off, no earthwork on Spare the Air days) that were touted to mitigate significant adverse air quality impacts generally were not enforced by the City or reported to PCAQMD.

Cumulative Regional. Cumulative air quality impacts (primarily diesel emissions, PM 10, NOx) from multiple construction projects, such as nearby Bickford Ranch, and other past, present and reasonable foreseeable projects in the city and county area should be analyzed. The project's incremental contribution to the cumulative air quality impacts should be disclosed.

City Enforcement of EIR Mitigation Measures. In general, City of Rocklin needs to better job of enforcing air quality mitigation measures adopted by our City Council in project EIRs. Numerous violations of Public Resource Code 2108.6 have easily been observed during casual commutes around town. PCAQMD has received calls of PM 10 violations from Rocklin construction sites. The City of Rocklin should address how it intends to meet CEQA mitigation monitoring requirements per of Public Resources Code Section 2108.6 that, to date, have not been well enforced, if enforced at all.

Cultural Resources

The EIR needs to fully discuss the existing conditions in the valley. The previous EIR was woefully inadequate with regard to proper disclosure of cultural resource impacts. This EIR should thoroughly disclose the uniqueness of the valley in that it is fairly intact and if not developed could be included in the National Register of Historic Places. Better coordination with United Auburn Indian Tribal representatives is needed in this process. The previous project had significant adverse impacts to cultural resources.

The 33 sites identified in the "misplaced" Peak report were located in 2-3 feet of grass and weeds. Given that this report with its limitations easily located sites dating to 5,000 B.C, it seems prudent to require a more comprehensive study be conducted to ascertain the full scope and historic significance of the valley before the decision is made to destroy it. Based on the limited assessments to date, no one can state with any certainty the full extent and historic significance of the cultural resources lying intact in the valley. Based on these limited studies, limited to a visible search in knee high weeds and a small number of shovel pits, 33 sites dating to 5,000 B.C. have been documented. Nisenen people buried their dead in and around their village. In a 7,000 year period of near continuous occupation (Peak Report) one could easily calculate many thousands of bodies buried there, and many thousands or millions of artifacts. There is no reasonable basis to assume that all bodies and artifacts are confined to the small areas visible through the weeds and delineated in Peak report. On the contrary, it is far more reasonable that many thousands or tens of thousands of bodies and historic artifacts are pervasive throughout the valley.

The discovery of these 33 sites dating back 7,000 was probably not anticipated by either the city or the developer when development of the valley was first contemplated. But the significance of this find is of such a magnitude that it warrants all of the protection afforded it by the CEQA process. At present, the true extent and historic significance of the cultural resources in Clover Valley has not been quantified. Therefore the EIR cannot accurately disclose the project's impact on cultural resources. Given the severe limits of the previous studies and the very large number of artifacts found in the very small number of shovel pits, and the number of years of continuous occupation (7,000) a more comprehensive cultural assessment of the valley is warranted. It's the responsible thing to do.

Biological Resources

Wildlife and Botany. A firm that specializes in soils and geology conducted the 2001 biological studies; that report should not be relied upon for impact analysis. A firm specializing in biological resources should update the terrestrial biological impact analysis. Much of the previous biological work by Drs. Sanders and Holland is over 13 years old and needs to be updated to meet current CEQA, ESA and CESA standards.

Fisheries and Aquatic Ecology. In order to comply with CDFG, USFWS and NOAA regulations, the EIR should include a quantitative water quality impact assessment of potential impacts to fisheries and aquatic resources in CV Creek. Modeling should be conducted for 2yr, 10 yr and 20 year rainfall events. Steelhead trout, rainbow trout,

Western Spadefoot Toad, Northwesten pond turtles are known to exist in the creek. Urban runoff studies in the City of Sacramento /Sac County have consistently shown that urban runoff creates episodic pulses of toxic runoff from the legal use of common herbicides, pesticides and rodenticides (City of Sacramento 2003). In fact, numerous creeks in Sacramento County and Placer County are classified as impaired under Section 303 (d) of the Clean Water Act primarily resulting from toxicity associated with urban pesticides (Central Valley Regional Water Quality Control Board 2003).

The EIR should present credible, up-to-date information on the health and vigor of the aquatic community assemblages in CV Creek. CDFG Rapid Bioassessment studies should be conducted and disclosed. The current level of baseline information in the previous EIR is inadequate. CDFG will require a more detailed assessment for the required Streambed Alteration Agreement. The previous report relies heavily on existing fish passage problems in CVC as the main reasons why steelhead have not been found or have been recently documented in CVC. PCWA water in Clover Valley Creek comes from the Bear River/Yuba River watershed that supports and attracts steelhead and salmon populations into local streams such as CVC. Steelhead are found in Auburn Ravine, located 10 miles north in similar terrain (water source, geology and habitats), and of course, in Miner Ravine Creek to which CVC is a tributary. The City should ensure that this project does not preclude the City's ability to restore the creek in the future. The Secret Ravine restoration project being proposed by the City with the Placer County FCWCD is a good example of what can be done if sufficient space is available to allow a creek to meander and to have overbank flooding. This translates into ensuring wide setbacks (100 feet or more), salmon/fish friendly bridge and drainage designs, strict enforcement by the City of its own stormwater ordinance, and open space policies.

The EIR should demonstrate that qualified experts looked for aquatic habitat special status species in the Clover Valley Creek area in question at the time when the special status species would be most evident.

Further, the EIR should disclose predicted impacts on resident fish such as bluegill, trout, minnows, and freshwater clams, including impacts resulting from the indirect loss of riparian habitat and concurrent increases on water temperatures, sediment, and degradation of water quality, including first-flush stormflows. If it is found upon closer review of the Clover Valley Creek habitat that special-status species are present, then a discussion of "take" becomes necessary. With the proposed development "take" will be in the form of physical, chemical, and biological factors.

Sedimentation Impacts. The proposed detention basins design will only create ponding of water in 10-year events or greater and are primarily effective for reducing peak flows, not improving water quality. The EIR should discuss the potential sedimentation impacts caused by the proposed detention basins on fish habitat in those areas upstream of the proposed creek crossing. At a minimum the DEIR should provide an assessment of the quality of fish habitat in these areas and whether or not sedimentation would impact important trout/steelhead spawning areas.

Stormwater Toxicity. Studies by the EPA as part of the Nationwide Urban Runoff Program (NURP) and more recent studies by CVRWQCB and other NPDES stormwater permittees have demonstrated the potential for toxicity from the first rainstorm of the year. The first rainstorm of the year has the most concentrated pollutant load due to pollutant build up during California's extended dry summer months. Detention ponds have little to no effect on dissolved constituents and are not considered feasible mitigation under CEQA for this specific water quality impact.

The NURP study revealed that the average copper concentration from a typical residential development has the potential to exceed the current California Toxics Rule standard for copper. Therefore, mitigation for copper toxicity from urban runoff to aquatic organisms should be properly addressed in the EIR.

Further, the EIR should disclose the potential for exceedances of other dissolved metals (lead, nickel, aluminum) from urban runoff and their effects on resident and anadromous salmonids that are known to occur in Clover Valley Creek. Clover Valley Creek is a tributary to Dry Creek, which is known to support a wide variety of resident fish and protected salmon and steelhead (USFWS). The EIR should quantify the predicted impact of the incremental increase in urban runoff on local and protected downstream fisheries.

EIR should discuss City's Phase II Stormwater permit and required ordinances (to be promulgated in Nov/Dec 2005 according to City's NPDES permit) and process CV developers will need to be strictly followed to ensure compliance.

Stormwater even with BMP's often retains water quality characteristics harmful to salmonids. (e.g. dissolved copper.), as discussed above. These limits are set forth in the California Toxics Rule (CTR). The EIR should provide an estimate of the water quality characteristics of the stormwater that will result from the project and its predicted impact on aquatic life and habitat. The EIR should describe what additional stormwater treatment measures will be employed if water quality objectives are exceeded, thereby causing "take" of special status species either in Clover Valley Creek or in downstream protected habitat, directly resulting from the project.

How will the City prevent people and their pets from trampling streamside vegetation and disturbing the stream habitat itself?

As stated previously in the Biology comments, the City should develop a predictive water quality model to provide substantial evidence in the record that stormwater runoff from CV project will not exceed state and or federal numerical standards for protection of beneficial uses of Clover Valley Creek. CVC is used for golf course irrigation, warmwater and coldwater fisheries, contact recreation, non-contact recreation and other important uses to our community. Existing conditions should be adequately characterized by site specific information obtained from available data sources including PCWA.

Please clarify what the City means by considering off-site and on-site infrastructure facilities.

Groundwater

What analytical method will the City use to predict project's impact to local groundwater supplies and quality?

Hydrology

Given the importance of the stormwater model being put forth to predict flooding, and given that the engineering firm that prepared the model is employed by the developer, serves as an advocate for the developer, and stands to gain materially if the project is approved; we suggest it would be prudent for the city to require that an independent firm specializing confirm the model and assumptions used in the predictions and prepare the hydrology chapter of the EIR. The City should not rely upon the developer's studies for their impact assessment in order to provide a truly independent and objective analysis as required by CEQA.

Cumulative Impacts

We suggest the City list the past, present and reasonably foreseeable projects within the City limits and nearby communities that when viewed cumulatively, create *regional* impacts. Findings from recent EIRs certified by this City Council should be presented along with the conclusions of this EIR to disclose to the residents of Rocklin and to demonstrate that the City staff and council understands the severity of approving this project. Rocklin is a sea of concrete rooftops and beautiful irrigated parks with little, if any, high value, natural open space. The Secret Ravine watershed and Clover Valley watershed are the last vestiges of natural open space in the City limits with perennial stream systems.

Political Environment

As a disclosure document, the EIR should include a factual, unbiased and comprehensive discussion of factors that could conceivably have a bearing on the nature and extent of mitigation measures that may be required by the city council and city staff. For example, if the city council or city staff previously accepted donations such as money, campaign funds, or gifts from the project proponents prior to or during the period this project has been protected by the development agreement it should be fully disclosed. Rocklin residents have the right to expect its City planners and elected representatives to be fully transparent on all matters.

In recent public meetings the developer has freely stated on multiple occasions that \$1.5 million was "extracted by the City" in exchange for annexation and approvals. This deal should be fully disclosed and presented in the EIR in the "Background" section.

The EIR should include a credible explanation why a 1993 cultural report listing just 7 sites was inserted in the previous DEIR rather than the most recent 1999/2000 Peak report listing 33 sites. The more comprehensive Peak report was transmitted to and received by city staff 9 months before the DEIR was published according to city records. Even after

all comments on the DEIR were submitted addressing cultural issues involving the 7 sites, city staff never acknowledged the existence of the Peak report until it was in the hands of Rocklin's own citizens who were required to invoke the Freedom of Information Act to learn of its existence.

Therefore, a credible, complete explanation is necessary in the EIR to establish the reliability of current information presented in the newest EIR. In the absence of a credible explanation it may be impossible for the reader to determine whether the information presented in the EIR is complete, or incomplete or skewed to support an undisclosed objective of the "lead agency" or of an individual, or has been unduly influenced by the project proponent.

Alternatives

Alternatives should be framed around the adverse impacts of the project (specifically cultural resources). The EIR should provide detailed discussion of project's specific goals and objectives. What is the range of alternatives being considered by planning staff in the EIR? How is the City proposing to develop alternatives and what criteria will be used to screen and define feasible alternatives to avoid, reduce or minimize impacts imposed on the community and region by the proposed project? The previous 2002 EIR did not meet CEQA requirements with regard to alternatives, especially regarding the magnitude and severity of impacts to cultural resources in the valley.

Sincerely,

Douglas L. Brewer

David R. Bennett

October 9, 2005

Mr. David Mohlenbrok City of Rocklin Community Development Department 3970 Rocklin Road Rocklin, CA 95677



Dear Mr. Mohlenbrok,

We are opposed to the project to develop the north section of Clover Valley. There are several reasons for our position, including:

- increased traffic
- destruction of wildlife and its habitat
- encroachment into setback of Clover Valley Creek
- dangerous grade of the proposed parkway
- obliteration of historic American Indian sites and remains
- devastation of thousands of oak trees having a homeowner plant a crepe myrtle to "replace" a mature oak is an oxymoron.

Thank you for considering our viewpoint.

Sincerely,

Dan Calabrese

3622 Clover Valley Rd

Rocklin 95677

Patricia Calabrese

Comments for Clover Valley Project

Aesthetics

The current visual environment of Clover Valley is open space and natural. This project will convert a intact natural environment to an unending extension of urban environment with lights, traffic signals, road cuts, signage and other visually intrusive elements.

1. The city should disclose in the Environmental Impact Report using detailed computer based visual simulations of the project's visual impact to the regional intactness, unity and vividness.

The views of the natural habitats and openness of Clover Valley are a welcome sight in a region of stucco homes and concrete roofs. Views from Sierra College Boulevard, Park Drive and other important public and private vantage points should be conducted (see Bickford Ranch EIR as an example). Conversion of current visual environment to urban landscape is a significant and unavoidable impact of urban development which requires override by Council and Statement of Findings of Fact and Statement of Overriding Considerations.

2. The city should require special design requirements and restrictions to minimize this impact.

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Comments for Clover Valley Project

Air Quality

Diesel exhaust is a known human carcinogen and the California Air Resources Board is working to regulate diesel emissions. Clover Valley is a relatively compact valley that can trap air pollutants during inversion periods. Summertime air quality conditions in Rocklin frequently exceed the federal smog standards.

1. The air quality impact analysis should analyze the potential air quality impacts from daily exposures to diesel fumes and particulates from diesel emissions to local residents in the Rawhide area.

Substantial daily diesel emissions in Rocklin from multiple construction sites and aggregate mining operations in western Rocklin area in summer of 2005 were observed; visible plumes of black diesel exhaust were transported during the hot summer months via prevailing winds to area residents in Breen and Whitney Oaks neighborhoods.

- 2. Existing air quality conditions in Clover Valley and nearby residential developments should be presented with site-specific data, not regional data that tend to underestimate/minimize localized air pollution events. Operational mitigation measures (shutting idling engines off, no earthwork on Spare the Air days, watering, etc.) that were touted to mitigate significant adverse air quality impacts generally were not enforced by the City or reported to Placer County Air Quality Management District (PCAQMD).
- 3. Cumulative air quality impacts (primarily diesel emissions, PM10, Nox) from multiple construction projects, such as nearby Bickford Ranch, and other past, present and reasonable foreseeable projects in the city and county area should be analyzed.
 - 4. The project's incremental contribution to the cumulative air quality impacts should be disclosed. Consideration should also be given to the level of impact smoke from the chimneys of the proposed homes will further contribute to a deterioration of air quality.

In general, City of Rocklin needs to better job of enforcing air quality mitigation measures adopted by our City Council in project EIRs. Numerous violations of Public Resource Code 2108.6 have easily been observed during casual commutes around town. PCAQMD has received calls of PM10 violations from Rocklin construction sites. Our group will ensure City of Rocklin meets CEQA mitigation monitoring requirements per of Public Resources Code Section 2108.6.

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- 1. A firm specializing in biological resources should update the terrestrial biological impact analysis.
- 2. Much of the previous biological work by Drs Sanders and Holland, two highly qualified scientists, is over 13 years old and needs to be updated to meet current California Environmental Quality Act, Endangered Species Act and California Endangered Species Act standards.

Fisheries and Aquatic Ecology.

1. In order to comply with California Dept. of Fish and Game (CDFG), United States Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA) regulations, the EIR should include a quantitative water quality impact assessment of potential impacts to fisheries and aquatic resources in Clover Valley Creek. Modeling should be conducted for 2yr, 10 yr and 20 year rainfall events. Steelhead trout, rainbow trout, Western Spadefoot Toad, and Northwestern pond turtles are known to exist in the creek.

Urban runoff studies in City of Sacramento /Sac County have consistently shown that urban runoff creates episodic pulses of toxic runoff from the legal use of common herbicides, pesticides and rodenticides (City of Sacramento 2003). In fact, numerous creeks in Sacramento County and Placer County are classified as impaired under Section 303 (d) of the Clean Water Act primarily resulting from toxicity associated with urban pesticides (Central Valley Regional Water Quality Control Board 2003).

2. The EIR should present credible, up-to-date information on the health and vigor of the aquatic community assemblages in Clover Valley Creek. CDFG Rapid Bioassessment studies should be conducted. The current level of baseline information in old EIR is inadequate.

CDFG will require detailed assessment for the required Streambed Alteration Agreement. The previous report relies heavily on existing fish passage problems in Clover Valley Creek (CVC) as the main reason for why steelhead have not been found or have been documented in CVC. PCWA water in Clover Valley Creek comes from the Bear River/Yuba River watershed that supports and attracts steelhead and salmon populations into local streams such as CVC. Steelhead are found in Auburn Ravine, located 10 miles north in similar terrain (water source, geology and habitats). Clover Valley creek does have its challenges but it also has tremendous restoration potential.

The City should ensure that this project does not preclude the city's ability to restore the creek in the future. The Secret Ravine restoration project being proposed by the city with the Placer County FCWCD is good example of what can be done if sufficient space is available to allow creek to meander and to have overbank flooding. This translates into ensuring wide setbacks (100 feet or more), salmon/fish friendly bridge and drainage designs, strict enforcement of city's natural resources, stormwater ordinance, and open space policies.

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- 1. What are the ranges of alternatives being considered by planning staff in the EIR?
- 2. How is the city proposing to develop alternatives and what criteria will be used to define feasible alternatives to avoid, reduce or minimize impacts associated with the proposed project?

The previous 2002 EIR did not meet California Environmental Quality Act requirements with regard to alternatives, especially regarding the magnitude and severity of impacts to cultural resources in the valley.

The city should consider alternatives that preserve the valley's intactness and avoid impacts to important sacred Indian Lands that reasonably achieve the project's goals and objectives. We understand the project has been revised since the last EIR but it is not transparent to the public that sensitive resources have been avoided. The city should clarify these revisions and make the public aware.

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Comments for Clover Valley Project

Traffic

The overall traffic scope looks sufficient. However, the Environmental Impact Report should discuss signalization needs at Sierra College Blvd. and Park Drive, relative costs, how these improvements will be funded and by whom.

- 1. The current project does not discuss this element or how Clover Valley Project will mitigate their contribution to regional traffic impacts.
- 2. The Environmental Impact Report should also predict and disclose the incremental increase in traffic accidents and potential fatalities from increased traffic on Sierra College Blvd., Park Drive and proposed roadways.

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Comments for Clover Valley Project

Hydrology and Water Quality

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- 1. Please clarify what the City means by considering off-site and on-site infrastructure facilities.
- 2. The EIR should discuss City's Phase II Stormwater permit and required ordinances (to be promulgated in Nov/Dec 2005 according to the city's National Pollution Discharge Elimination System permit) and process Clover Valley developers will need to follow to ensure compliance.
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- 2. The EIR should describe the uniqueness of the valley in that it is fairly intact and has qualified to be included in the National Register of Historic Places.
- 3. Better coordination with United Auburn Indian Tribal representatives is needed in this process.
- 4. The previous project had significant adverse impacts to cultural resources; alternatives should be developed to avoid, reduce or minimize these impacts that reasonably achieve developers' goals.

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The current visual environment of Clover Valley is open space and natural. This project will convert a intact natural environment to an unending extension of urban environment with lights, traffic signals, road cuts, signage and other visually intrusive elements.

1. The city should disclose in the Environmental Impact Report using detailed computer based visual simulations of the project's visual impact to the regional intactness, unity and vividness.

The views of the natural habitats and openness of Clover Valley are a welcome sight in a region of stucco homes and concrete roofs. Views from Sierra College Boulevard, Park Drive and other important public and private vantage points should be conducted (see Bickford Ranch EIR as an example). Conversion of current visual environment to urban landscape is a significant and unavoidable impact of urban development which requires override by Council and Statement of Findings of Fact and Statement of Overriding Considerations.

2. The city should require special design requirements and restrictions to minimize this impact.

Jim E. Carron 10-5-05

Comments for Clover Valley Project

Cultural Resources

The Previous Environmental Impact Report (EIR) was woefully inadequate with regard to properly disclosing cultural resource impacts.

- 1. The EIR needs to fully discuss the existing conditions in the valley.
- 2. The EIR should describe the uniqueness of the valley in that it is fairly intact and has qualified to be included in the National Register of Historic Places.
- 3. Better coordination with United Auburn Indian Tribal representatives is needed in this process.
- 4. The previous project had significant adverse impacts to cultural resources; alternatives should be developed to avoid, reduce or minimize these impacts that reasonably achieve developers' goals.

Jm E. Carmon 10-5-05

Comments for Clover Valley Project

Cumulative Impacts

- 1. We suggest the city list the past, present and reasonably foreseeable projects within the City limits and nearby communities that, when viewed in their totality, create regional impacts.
- 2. Findings from recent Environmental Impact Reports certified by this City Council should be presented along with the conclusions of this EIR to disclose to the residents of Rocklin and to demonstrate that the city staff and council understands the severity of approving this project.
- 3. Rocklin is a sea of concrete rooftops and irrigated parks with little, if any, high value, natural open space. The Secret Ravine watershed and Clover Valley watershed are the last vestiges of natural open space in the city limits with perennial stream systems.

Jam E. Cannon 10-5-05 Dear Mr. mohlenbrok, The sincerely hope you will decide to preserve Clover Park as it is now , It would be a share to create traffic and conjustion into a quiet neighborhood which we appreciate so much. Then we retired we moved here Pyears ago - for that very To lead to a flood of traffect from 12 Bridge, Bickford Rankh and Lercoln - nor do we want the encreased smog and pollution please give us stome carful thought and preserve Clover Valley, Severely, Ethel & Phil Edsebalt

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Clover Valley Project

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

COMMENT FORM OCT 1 4 2005
o be added/corrected on our mailing list and to document the author of comment eceived, please provide the following information. Thank you.
vame: Holly Clark
Address: 5320 Front St.; Rocklin 95677
Organization: M.S. Clark Roofing Siera Giloge
Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.
There aren't many Places like
this loft. The City of Rocklin
has fail, many toms before,
on preserving historical?
Tichly diverse places this
15 tor today's Children 7
tommorrons children. We need
to think about the future,
Not just the now.

(Prior to mailing this form, please fold form so that address on back is clearly visible, and attach necessary postage)

Clover Valley Project

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

OCT 1 4 2005

COMMENT FORM

To be added/corrected on our mailing list and to document the author of comments received, please provide the following information. Thank you.

Address: <u>5548 Sage dv rochlin CA</u> Organization: Please provide us with your written comments on the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the scope of the EIR by 5:00 processes and the s
Please provide us with your written comments on the scope of the EIR by 5:00 pr
Please provide us with your written comments on the scope of the EIR by 5:00 processes 14, 2005.
Le think its horrible went you people are planning to the first bruther place. I think may be you should think twice about what you are doing. Temember once its gone it can never be replaced!! A hope you think about it and real-ze the error of your ways. Ohh year remember your and always birild some when else!!

(Prior to mailing this form, please fold form so that address on back is clearly visible, and attach necessary postage)

Clover Valley EIR.

OCT

5 2005

As an Exercise Physiologist and Registered Nurse, we see the VALLEY VIEW-PARKWAY as a serious public health issue.

Rocklin is a severe non-attainment area for ozone under both Federal and State standards. Ozone causes runny eyes, nose and throat irritation, breathing difficulties, and it affects the function of the heart. Recent findings show it causes asthma in children. This accounts for 10.1 million lost school days in children each year. (1) The incidence of pediatric asthma is climbing. According to the CDC, the national asthma rate has doubled in 20 years. It is not ethical to expose Rocklin's schools, playgrounds and residential areas to additional ozone pollution based on the epidemiological data currently available. Our very own California EPA and Office of Environmental Health Hazard Assessment has a news release dated October 19,2004. The contact person is Allan Hirsch at 916.324.0955 or www.oehha.ca.gov. A childrens respiratory health study was conducted in the Bay Area, due to its good air quality. The results are published in the September 2004 issue of The American Journal of Respiratory and Critical Care Medicine. This study found higher rates of asthma and bronchitis symptoms in children residing and attending school in neighborhoods with higher levels of traffic-related air pollution. Pollutants most clearly identified as associated with worsening health of people with asthma and with asthma attacks are sulfur dioxide, ozone and particulate matter. (2)

Rocklin has non-attainment status under State standards for **particulate matter**. The relationship between tiny particulate air pollution and excess death rate has been confirmed in 90 USA cities. It is linked to premature death. Particulate matter from micro-pollution in traffic areas increases the risk of cardiovascular disease. This would affect *all* the residents of Rocklin.

Fine particulates have a carbon core attached to which are approx. 18,000 combustion products. Medical and air quality professionals around the world know that these cause respiratory symptoms, lung cancer, heart attacks, atherosclerosis, strokes, high blood pressure, asthma and premature death. Studies suggest sensitivity in diabetics, pregnant women and their fetuses. These effects include prematurity, SIDS and retarded lung development.

Key factors resulting in the greatest health risk are living or attending school within 660 feet of a road with high traffic volumes. (3) Although emissions in the USA have been reduced, the increase in total miles driven has kept total emissions unchanged. It is not a question of 16,000 vehicles on the Valley View Parkway, but how many miles will those vehicles be driving?

Policy considerations should be designed to *reduce* ambient levels of ozone and particulate air pollution. Carbon storage in trees moderates global warming, and photosynthesis protects us against pollution. I do not think the city should even consider the cutting down of trees for development in view of our non-attainment status for both ozone and particulate matter.

Other specific policy recommendations are to *require* accommodation of pedestrians and bicyclists in *all* projects to help promote these non-polluting methods of transportation. Smart growth land use planning encourages the development of *existing* urban areas. All new projects should require *health impact evaluations*.

Planning requirements should require any new road project anticipated to carry > 10,000 vehicles/day to include a buffer zone of *at least* 1,000 feet to minimize direct vehicle emission exposures to nearby populations.

Ask people why they are leaving Los Angeles for San Luis Obispo. Ask why they are leaving the Bay Area for Placer County. The answer is "traffic." Let us not convert Rocklin into a place that people want to leave. A solution to the Clover Valley controversy will require both backward vision and forward vision. I pray that our city leaders rise to the task.

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- 2. Teague, w.g. et al.; Outdoor air pollution. Asthma and other concerns; Pediatr Clin North Am 2001 Oct:48(5):1167-83,ix.
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Re: Clover Valley EIR

MOTOR VEHICLE AIR POLLUTION AND PUBLIC HEALT ASTHMA AND OTHER RESPIRATORY EFFECTS

OCT 5 2005

Asthma in the United States

Asthma is a widespread, chronic lung disease in which the airways are inflamed and respond to stimuli such as allergens, cold air, irritant chemicals and air pollution by narrowing. This narrowing of the airways can result in significant difficulties in breathing ("asthma attacks") requiring medication, and if sufficiently severe can result in the need for physician attention, hospital admission and even death.

Approximately 15 million persons in the United States are estimated to have asthma, resulting in over 1.5 million emergency department visits, about 500,000 hospitalizations, and over 5,500 deaths each year¹. An estimated 10.5 million Americans (including 3.8 million children < age18) had an asthma attack or episode in 1999. Asthma also accounts for an estimated 3 million lost workdays in adults and 10.1 million lost school days in children each year. The estimated total cost related to asthma is \$12.7 billion in \$2000, with \$8.1 billion in direct costs and \$4.6 in indirect costs.²

Overall asthma prevalence has increased dramatically over the past two decades, rising 75 percent between 1980 and the average in 1993-4. While the highest prevalence of asthma is in children ages 5 to 14, the greatest increase in asthma prevalence has occurred in children ages 0 to 4 which increased 160 percent over the 15-year period³. More recent data suggests that overall asthma mortality and morbidity may be leveling, though a change in 1997 in the way asthma health statistics are collected makes it too early to determine if this represents a long-term trend. What remains clear is that asthma disproportionately affects the Black population, with asthma prevalence rates that are more than 21 percent higher than whites⁴.

Motor Vehicle Air Pollution and Asthma

An extensive body of scientific studies spanning at least three decades has documented the link between air pollution and negative health impacts on people with asthma, including asthma attacks. The pollutants most clearly identified as associated worsening the health of people with asthma and with asthma attacks are sulfur dioxide, ozone and particulate matter⁵ 6.

More recently, a small but growing body of scientific evidence suggests that air pollution may play a role in the development of asthma⁷ and impairs long-term lung development⁸, with a primary focus on motor vehicle-related air pollution.

Motor vehicles are a significant source of the volatile organic hydrocarbons and nitrogen oxides that combine in the presence of heat and sunlight to form ground-level ozone, contributing approximately 25 and 33 percent respectively of the nation's total in 2000. In addition, while direct motor vehicles emissions are a relatively small contributor to the nation's overall emissions of particulate matter (PM₁₀ and PM_{2.5}), heavy-duty trucks and buses and off-road construction equipment are a significant source of exposure to particulate matter in urban areas. When particulate matter from paved and unpaved roads are included with direct motor vehicle emissions, the combined direct and indirect contribution of motor vehicles amounted to 49 and 55 percent of national PM₁₀ and PM_{2.5} emissions, respectively, in 2000⁹.

In just the past five years alone, more than a dozen studies have been published in the peer-reviewed scientific literature assessing the linkage between various health indicators of asthma and other lung health problems with exposure to motor vehicle pollution. A smaller subset of these studies have examined the association of motor vehicle pollution and the prevalence of asthma and other chronic respiratory health concerns — that is, the role of motor vehicle pollution in the development of asthma and other chronic lung disease. Many of these studies have been conducted in Europe, particularly Germany, Holland, Italy and the United Kingdom as well as in the United States and Canada. The vast majority of these studies have found a worsening of asthma as measured by a variety of health outcome measures. Findings of these studies are summarized below.

Acute Effects of Motor Vehicle Pollution on Asthma and Other Respiratory Health Effects

A recent study in Southeast Toronto, Canada¹⁰ assessed exposure to fine (PM_{2.5}) particulate matter primarily from motor vehicles using a geographic information system, which was then compared with hospital admission data from 1990 to 1992. The investigators found that a ten-fold increase in estimated exposure to fine particles (average 26 g/24 hr vs. maximum of 1183 g/24hr) has a significant effect on admission rates for a subset of respiratory diagnoses (asthma, bronchitis, chronic obstructive pulmonary disease, pneumonia, and upper respiratory tract infection), increasing the risk of admission for these diseases by 24 percent.

A study of pediatric (age 0-14) hospitalization for asthma in Erie County, New York excluding the city of Buffalo¹¹ compared the residential location of white children admitted for asthma with children in the same age range admitted for nonrespiratory diseases. After accounting for the age and poverty level of the children, children hospitalized for asthma were almost twice as likely (93%) to be living within 200 meters (660 feet) from roads with the highest amount of annual vehicle miles traveled (VMT), an indicator of traffic levels, and were 43 percent more likely to have trucks and trailers passing within 200 meters of their residence. The study did not find a significant association with residential distance from state roads (which typically do not have residences in close proximity), annual VMT within 500 meters (1650 feet), or whether trucks or trailers passed within 500 meters. This finding is consistent with results from other traffic proximity studies (see below), which indicate that the greatest risk of health impacts for people with asthma is exposure within 150 – 200 meters of major traffic sources.

A "real world" study approach was used to assess the impact on acute asthma events in children from a significant drop in traffic volumes and resulting lower ozone levels that were associated with the 1996 Summer Olympic Games in Atlanta, Georgia. The study 12 found that the 22.5% drop in weekday morning traffic volumes during the Summer Games was associated with a 28% decrease in peak daily ozone levels (accounting for meteorology). This reduction in ozone levels was associated with a large drop in acute care visits for asthma (41.6% reduction recorded in the Georgia Medicaid claims file and 44.1% in an HMO database), as well as an 11.1% reduction in hospital ER visits at 2 pediatric emergency departments and a 19.1% drop in hospitalizations for asthma as recorded in the Georgia Hospital Discharge Database. The study authors conclude that reduced downtown Atlanta traffic congestion during the Olympic Games resulted in decreased traffic density, which "was associated with a prolonged reduction in ozone pollution and significantly lower rates of childhood asthma events."

A study of traffic patterns and respiratory symptoms was conducted between 1994-95 in ten areas of northern and central Italy in over 39,000 children ages 6-7 and 13-14¹³. For children living in metropolitan areas, the study found "a clear association between a high flow of heavy vehicles near their residence and several respiratory conditions." A 44% odds increase was found for

children reporting only bronchitic symptoms, while a 10% increase was found in reports of asthma or wheeze (these latter results were not statistically significant). An earlier report of the same study found a 69% increase in the occurrence of recurrent bronchitis, a 74% increase in bronchiolitis, and an 84% increase for pneumonia. The likelihood of severe bronchitis and wheezing symptoms occurring was also increased, with a 68% increase in persistent phlegm for more than 2 months and a 86% increase in wheeze severe enough to limit speech.

A study in Munster, Germany¹⁵ of more than 3,700 children ages 12-15 used both written and video questionnaires to assess self-reported symptoms of asthma and allergic rhinitis as well as exposure to motor vehicle traffic. The study found approximately a 50 – 60 % increase in the prevalence of wheeze for children reporting "frequent" truck traffic (the range is due to differences between the written and video questionnaire responses) compared to the children reporting no truck traffic exposure, while prevalence of wheeze more than doubled for those children reporting "constant" truck traffic exposure. Symptoms of allergic rhinitis increased more than 70% and were almost double for children reporting exposure to "frequent" and "constant" truck traffic, respectively. The study, which accounted for indicators of socioeconomic status, smoking and other potential confounding variables, found a similar positive association with self-reports of traffic noise as another indicator of truck traffic exposure. The authors note that the findings of this study are consistent with a previous study conducted by the authors in Bochum. Germany.

Though somewhat less current than the studies discussed above, a study from Great Britain published in 1994¹⁶ examined the relationship of hospital admissions for asthma in children less than 5 years old and residence near major roads in Birmingham, England. This study compared the area of residence and traffic flow patterns for the children admitted to the hospital for asthma with those of children admitted for nonrespiratory reasons as well as a random sample of children from the community. Children admitted with an asthma diagnosis were significantly more likely to live in an area with high traffic flow (> 24,000 vehicles/hour) near a main road than children admitted for nonrespiratory reasons or children from the community. A statistically significant linear trend was observed for traffic flow for children living less than 500 meter (1650 feet) from a main road but not for those living further away.

Chronic Effects of Motor Vehicle Pollution on Asthma and Other Respiratory Disease

The acute effects of motor vehicle pollution on worsening asthma and the related public health impacts (e.g. increases in medication use, doctor and ER visits, hospital admissions) associated with aggravation of that condition represent a major public health concern. However, the possible contribution of motor vehicle pollution to the development of asthma, frequent respiratory infections and potential long-term effects of retarded lung growth and reduced lung function in children (which can lead to chronic lung disease later in life) may have even greater long-term public health significance.

A comparatively smaller but increasing body of studies has examined the impact of motor vehicle pollution on the development of asthma, frequent respiratory infections and the impact on developing lung function in children. Several of these studies are described below.

A study of 4,000 babies in The Netherlands¹⁷ who were assessed by questionnaire at age 2 compared levels of traffic-related air pollution (nitrogen dioxide, PM_{2.5}, and "soot") at the home with the development of asthmatic/allergic symptoms and respiratory infections. A positive association was found for higher levels of these pollutants at the home with wheezing, physician-

diagnosed asthma, ear/nose/throat infections, and flu/serious colds. Additional analysis suggested somewhat stronger associations with traffic for asthma that was diagnosed before age 1. The investigators indicate that these findings need to be confirmed at older ages when asthma can be more easily diagnosed.

A similar study in Munich, Germany¹⁸ assessed the impact of traffic-related air pollution (PM_{2.5} and nitrogen dioxide) on the long-term health of over 1,750 infants. Significant associations were found between these pollutants and cough without infection and dry cough at night in the first year of life. These effects were somewhat reduced in the second year of life. There was also an indication of an association between traffic-related pollutants and symptoms of cough, though the authors note that due to the very young age of the infants it is too early to draw definitive conclusions regarding the development of asthma.

A Dutch study¹⁹ of chronic respiratory symptoms in over 1000 schoolchildren in 13 schools located within 1000 meters (3,300 feet) from major freeways in the Province of South Holland. The study found that cough, wheeze, runny nose, and doctor-diagnosed asthma were significantly more often reported for children living within 100 meters (330 feet) from the freeways. Truck traffic intensity and the concentration of black smoke (a surrogate measure of fine particulate matter) measured in schools were found to be significantly associated with chronic respiratory symptoms.

A study in Nottingham, UK^{20} examined the relationship between living near a "main road" and the risk of wheezing illness, which is often an indicator of asthma, in over 6000 schoolchildren age 4-11 and approximately 3,700 secondary schoolchildren age 11-14. The study found that for children living within 150 meters (500 feet) of the roadway the risk of wheeze increased by eight percent for the primary schoolchildren, and 16 percent for the secondary schoolchildren, per 30 meter (100 feet) increasing proximity to the road. The study also found that most of the increased risk of wheeze occurred in children living within 90 meters (300 feet) of the road.

A nationwide study of over 331,000 middle-school children in Taiwan²¹ assessed the relationship of traffic-related air pollutants and the prevalence of asthma. Traffic-related air pollution, especially carbon monoxide and nitrogen dioxides, was positively associated with the prevalence of asthma in middle-school children in Taiwan.

A study of more than 5,000 children in two age groups (5-7 years and 9-11 years) in Dresden, Germany²² found that increased exposure at home and school to the traffic-related air pollutants benzene, nitrogen dioxide and carbon monoxide was associated with the prevalence of morning cough and bronchitis. However, indicators of allergy were not associated with these pollutants.

A study of 843 seven-year olds in eight nonurban communities in Austria²³ were studied to assess the relationship of exposure to traffic-related pollution (nitrogen dioxide was used as an indicator pollutant) with the prevalence of asthma and respiratory symptoms. Communities with low, regular and high levels of NO₂ were compared with communities with very low levels with respect to asthma prevalence, and the respiratory symptoms wheeze and cough apart from colds. The prevalence of asthma in the children at any time was increased by almost 30%, more than double and almost six times in the low, regular and high communities respectively were compared to the very low communities. For the symptoms of wheeze and a cough apart from colds a similar trend of increasing health effects for communities with increasing pollution levels was observed.

One of the early studies of the effects of road traffic on respiratory health examined the effect of road traffic in Munich, Germany on more than 6500 children age 9-11 on pulmonary function, respiratory symptoms and the prevalence of asthma and recurrent bronchitis²⁴. Two measures of pulmonary function showed a decline per increase of 25,000 cars per day passing through the school district on the main road. The prevalence of recurrent wheeze and shortness of breath (dyspnea) were increased with increasing road traffic. Lifetime prevalence of asthma and recurrent bronchitis were also increased, but were not statistically significant.

Other Relevant Studies

A study of a sample of 5000 people ages 55-69 years in the Netherlands²⁵ assessed long-term exposure to traffic-related air pollutants (black smoke, an indicator of fine particles, and nitrogen dioxide) at their residence in 1986 and potential association with mortality during an eight-year follow-up period. The study found that the risk of dying from cardiopulmonary causes was almost two times higher for people living near a major road.

An analysis of the impact of motor-vehicle pollution in Austria, France and Switzerland²⁶ using PM₁₀ as the pollutant of concern estimated that air pollution in these countries is responsible for six percent of total deaths. The study found that approximately 20,000 deaths each year, or about one-half of all deaths caused by air pollution, could be attributable to motor vehicles. In addition, the study calculated that motor vehicle pollution also accounted for more than 25,000 new cases of chronic bronchitis in adults, more than 290,000 episodes of bronchitis in children, more than half a million asthma attacks and more than 16 million person-days of restricted activity each year.

Conclusions

An extensive body of epidemiological studies has been published over the past decade examining the health impacts, especially on children, of direct exposure to one or more pollutants associated with motor vehicles. The vast majority of these studies have found strong associations between health effects associated with worsening asthma and other acute respiratory health concerns and direct exposure to motor vehicle pollution resulting from residing or attending school near major roads with high traffic levels. Living or attending school within approximately 200 meters (660 feet) of a road with high traffic volumes and significant truck traffic appear to be key factors that result in the greatest health risk.

A somewhat smaller, but increasing, body of epidemiological studies has examined the association of longer-term exposure to high levels of motor vehicle pollution and has generally found an increase in the prevalence of asthma and chronic respiratory symptoms, as well as reduced lung function. The current evidence is suggestive of a contribution of motor vehicle air pollution to the development of asthma and chronic bronchitis, though these findings will need to be confirmed in future studies.

General Policy Considerations

This review of the medical literature clearly indicates that current levels of ozone and particulate air pollution contribute to the exacerbation of pre-existing asthma, and it also is highly suggestive

that ozone exposure contributes to the development of asthma as a disease, at least in children. Living near to a major thoroughfare and exposure to truck traffic also appear to increase risk of asthma and other respiratory diseases. General policy considerations should therefore be designed to reduce ambient levels of ozone and particulate air pollution, and to reduce exposures to truck exhaust and high-density thoroughfares.

Policy options available include further reducing air emissions. While some improvements have been made to on-road diesels engines in recent years, leading to reduced emissions, off-road diesel engines have not been more tightly regulated, and could most easily be reduced. Because most diesel vehicles have long periods of use, changes in new diesel engines would not be expected to produce lowered on-road diesel emissions for many years. Therefore, policies that lead to retrofitting of existing on-road diesel vehicles would speed up reductions in diesel emissions. Lastly, although emissions from gasoline-powered motor vehicles have been substantially reduced over the past 20 years, the increase in miles driven has kept total emissions from decreasing significantly. Improvements in fuel efficiency and further tightening of emission standards of the motor vehicle fleet would aid in lowering overall emissions.

In addition to policies requiring re-engineering of motor vehicles, transportation policies that reduce vehicle miles traveled are also needed to reduce overall air pollution emissions. Such policies include support for mass transit, increasing and improving incentives and facilities for bicycling and walking, and shifting to non-road modes of freight transit, including water and rail.

Specific Policy Recommendations for TEA-3

Reduce concentrations of ozone and particulate air pollution- since there is growing evidence for adverse effects of pollutants on people with asthma even with concentrations below current standards, all areas of the country should act to lower local and regional air pollution concentrations.

- 1. Increase funding to Congestion Mitigation/Air Quality programs to keep pace with increased areas and population in non-attainment areas.
- 2. Require effective inspection and maintenance programs for medium and heavy-duty vehicles, and retrofit existing diesel vehicles to reduce emissions.
- 3. Increase funding for public transit, the Enhancements program and the recreational trails program to shift trips made to less-polluting modes than private motor vehicles
- 4. Require routine accommodation of pedestrians and bicyclists in all projects to help promote these non-polluting modes of transportation.
- 5. Advocate for state/local "smart growth" land use planning to encourage development of existing urban areas and appropriate mix of commercial and residential development with mass transit access to minimize motor vehicle use.

Increase distances between major roads and residential areas- since residence near a major road has been shown to convey particularly increased risk of asthma symptoms and exacerbation, all efforts should be made to increase the distance between major roads and residences.

1. Require health impact evaluations of all new projects, and include distances of residences, schools, and recreational areas as a measure to be evaluated and maximized. Ensure land use planning requirements require any new road project

- anticipated to carry $\ge 10,000$ vehicles/day includes a buffer zone of at least 1000 feet to minimize direct vehicle emission exposures to nearby populations.
- 2. Increase public involvement in the planning process.

Improve accountability and provide more data to evaluate impacts of projects on community health

- 1. Establish health-based performance measures for new projects.
- 2. Include specific funds for public health programs to track rates of asthma in communities in TEA-3.

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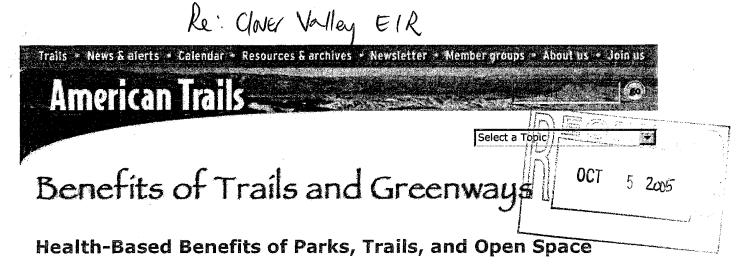
²³ Studnicka, M. et al.: Traffic-related NO2 and the prevalence of asthma and respiratory symptoms in seven year olds; Eur Respir J 1997 Oct;10(10):2275-8.

²⁴ Wjst, M. et al.; Road traffic and adverse effects on respiratory health in children; BMJ 1993 Sep 4;307(6904):596-600.

²⁵ Hoek, G. et al.; Association between mortality and indicators of traffic-related air pollution in the Netherlands: a cohort study.; Lancet 2002 Oct 19;360(9341):1203-9.

²⁶ Kunzli, N. et al.; Public-health impact of outdoor and traffic-related air pollution: a European assessment; Lancet 2000 Sep2;356 (9232):795-801.

²⁰ Venn, A.J. et al.; Living near a main road and the risk of wheezing illness in children; Am J Respir Crit Care Med 2001 Dec 15; 164(12):2177-80.



Researchers document many benefits of regular exercise provided by community trails.

Economic Impacts of Protecting Rivers, Trails, and Greenway Corridors., Rivers, Trails and Conservation Assistance Program. Department of the Interior. National Park Service, Western Region, San Francisco California.

"People who exercise regularly have 14 percent lower claims against their medical insurance, 30 percent fewer days in the hospital, and have 41 percent fewer claims greater than \$5,000 ("Feasibility Study: Corporate Wellness Program", City of San Jose Department of Parks, Recreation, and Community Services, 1988).

"Exercise derived from recreational activities lessens health related problems and subsequent health care costs. Every year, premature deaths costs American companies an estimated 132 million lost work days at a price tag of \$25 billion. Finding and training replacements costs industry more than \$700 million each year. In addition, American businesses lose an estimated \$3 billion every year because of employee health problems (National Park Service, 1983)."

The Case for Urban Open Space. Poole, William. 1993. Draft report prepared for Trust for Public Land, San Francisco, California.

"One key link between parks and health might be the opportunity for regular exercise and to escape what Olmsted called 'jar of the streets.' Exercise helps maintain healthy bones and muscles, builds cardiovascular fitness and relieves the psychological and physiological stress long linked to poor health. The chance to escape the city's noise and bustle also relieves stress, which might otherwise be expressed through aggression or the abuse of drugs and alcohol. Parks also contribute to public health by helping to mitigate air pollution, noise and other environmental stressors, and by acting as green buffers between industrial areas and residential neighborhoods."

"As the federal government struggles to trim the nation's health-care costs it cannot afford to ignore relatively inexpensive environmental changes that may foster health in millions of Americans for years to come."

The Contribution of Recreation and Parks to Reducing Health Care Costs: From Theory to Practice. Godbey, Geoffrey. 1993. In Trends: Justifying Recreation and Parks to Decision Makers, v. 30, no. 4.

"...the U.S. currently spends more for health care than any nation on earth--14 percent of our Gross National Product... The federal government deficit currently amounts to about \$17,000 per person. With huge and mounting debt in every sector and a population which is both aging rapidly and increasingly dependent, curtailing health care costs will be a priority of government and doing this will involve reinventing our notions of what constitutes efficient and effective health care. Emphasis will be on prevention. During this process, parks and recreation has the opportunity to become a significant factor in the wellness revolution. Doing this will involve: reconceptualizing what they do, documenting

the wellness benefits of services and implementing benefits based management."

"At the municipal level, there are already some precedents for state or local health agencies providing funding targeted to specific facilities or services of recreation and park agencies which have measurable wellness outcomes. The Healthy People 2000 statement of national opportunities, coordinated by the U.S. Department of Health and Human Services and involving a coalition or 22 expert working groups, specifically targeted increases in community availability and accessibility of physical activity and fitness facilities. These include hiking, biking, and fitness trails, public swimming pools, and acres of park and recreation open space."

"In summary, recreation and park services provide opportunities to individuals which have positive health benefits. These effects can and must be measured and analyzed in terms of cost savings in pubic health expenditures. Doing so will often involve collaborative efforts with public health agencies. While educators and professionals are now involved in the effort to measure benefits associated with recreation and parks,...this measurement process must proceed from a paradigm which expresses the outputs or consequences of such services. That paradigm is wellness."

An American Network of Parks and Open Space: Creating a Conservation and Recreation Legacy. Texas Parks and Wildlife and the National Park Service. August 1994.

"we know that the United States spends more for health care than any other nation on earth--\$898 billion in 1993, or an estimated \$3,358 per person14 percent of our gross national product. We have also learned that in order to keep costs down, future health care strategies must focus on prevention.

The most important prescriptions for creating effective preventative care are regular exercise and a moderate diet. According to the 1990 Healthy People 2000 report, there is increasing evidence that light to moderate physical activity, often associated with recreation behavior, can have significant health benefits. The report recommends several appropriate actions, including significant investments in recreation resources, such as areas for hiking, biking and swimming."

1995

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Health Benefits

01/23/96

* Access to parks and open space and the recreational opportunities that they provide helps to encourage a physically active lifestyle. This lifestyle improves general health and wellness and saves communities and businesses healthcare costs.

Rivers, Trails and Conservation Assistance Program. 1995. <u>Economic Impacts of Protecting Rivers</u>, <u>Trails</u>, <u>and Greenway Corridors</u>. <u>Department of the Interior</u>. National Park Service, Western Region, San Francisco, California.

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Clover Valley is a

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recreation rejeurce!

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EWS RELEASE

OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT

FOR IMMEDIATE RELEASE:

Release No. 04-09 October 19, 2004

CONTACT: Allan Hirsch

(916) 324-0955 OCT

2005

www.oehha.ca.gov

OEHHA Study Shows Possible Link Between Traffic Pollution, Children's Respiratory Symptoms

Even in an area with good regional air quality, air pollution from nearby traffic may pose a health risk, according to a recently completed study by scientists from Cal/EPA's Office of Environmental Health Hazard Assessment (OEHHA) that shows a possible link between air pollution from nearby traffic and respiratory symptoms in children.

The study, which involved air monitoring and a health survey of about 1,100 students at 10 Alameda County elementary schools located various distances from major roads, found moderately higher rates of asthma and bronchitis symptoms (such as wheezing and excessive phlegm) in children residing and attending school in neighborhoods with higher levels of trafficrelated air pollution. Scientists from OEHHA and the Lawrence Berkeley National Laboratory collaborated on the study, which was published in the September 1, 2004 issue of the American Journal of Respiratory and Critical Care Medicine.

In addition, a recent companion study by scientists at OEHHA and the state Department of Health Services found that about 150,000 California students (about 2.5 percent of students statewide) may be attending schools located close to roads with very high traffic levels (more than 50,000 vehicles/day). That study was published in Environmental Health Perspectives in January 2004.

"Our studies underline the importance of California's continuing efforts to reduce motor vehicle emissions," OEHHA Director Dr. Joan E. Denton said. "There is a growing body of evidence that children exposed to high levels of traffic pollution may be more susceptible to asthma and bronchitis symptoms."

In the respiratory health study, which took place during the 2000-01 school year, Berkeley Lab scientists measured concentrations of several traffic-related pollutants (including particulate matter - or soot - and nitrogen oxides) outside 10 schools in an area between Oakland and Hayward. OEHHA scientists used questionnaires, completed by participating students' parents, to collect health and demographic information on nearly 1,100 third, fourth and fifth graders at the schools. The school locations were assumed to be representative of the

children's overall exposure to traffic pollutants, as most of the students live in neighborhoods close to their schools.

Although a number of studies (primarily in Europe) have reported links between residential proximity to busy roads and respiratory health effects, few have actually measured pollutant concentrations in areas near busy roads. In fact, OEHHA's study was the first in the United States to evaluate the relationship between measured levels of traffic-related pollutants and respiratory symptoms.

The study found that the prevalence of asthma and bronchitis symptoms were about 7 percent higher in children in neighborhoods with higher levels of traffic pollutants compared with other children in the study. The study was not designed to determine whether traffic pollution causes new cases of asthma, but instead whether traffic pollution is associated with the likelihood of symptoms in children with existing asthma.

"It was important to perform this kind of study in California, because we have a different mix of motor vehicles and different land use patterns than in Europe. We could not assume that the European study results automatically apply to California and other states," said Dr. Bart Ostro, an OEHHA scientist and one of the study's co-authors.

"The Bay Area was a good location for the study because it has relatively good regional air quality," Ostro said. "That makes it easier to evaluate the specific effects of air pollution from nearby traffic."

In the companion study, OEHHA and DHS researchers used databases from the Department of Education (CDE) and the Department of Transportation to evaluate the proximity of almost 7,500 California public schools to freeways and busy roads. In light of previous studies that have found traffic pollution levels to be higher within 500 feet downwind of major roads, the study estimated the number of schools within 500 feet downwind of roads with traffic volumes exceeding 25,000 vehicles per day and 50,000 vehicles per day.

The study found that about 2.3% of public schools (about 170 schools) enrolling about 150,000 students are located within 150 meters (500 feet) of roads exceeding 50,000 vehicles per day. An additional 7 % of public schools (about 530 schools) enrolling about 570,000 students are located within 500 feet of roads with 25,000 to 50,000 vehicles per day.

Furthermore, using school demographic data and 2000 census data, state scientists found that schools located closer to high-traffic roads had higher percentages of African-American and Hispanic students compared to the schools having no busy roads nearby. The schools located near high-traffic roads also had higher percentages of socioeconomically disadvantaged students (such as

those receiving free/reduced price school meals or who are English language learners).

A school's location near a busy road does not always mean children will be exposed to high levels of traffic pollution. Other factors that influence this include whether the school is upwind or downwind from the road, and the school's ventilation system.

The preliminary results of the two studies formed part of the scientific basis for a 2003 state law (Senate Bill 352 by Senator Martha Escutia) that limits the construction of new schools near busy roads.

An abstract of the children's respiratory health study is available online at http://airccm.atsjournals.org/cgi/content/abstract/170/5/520, and hard copies of the study can be obtained by contacting OEHHA. The statewide school survey is available online at http://ehp.niehs.nih.gov/members/2003/6566/6566.pdf.

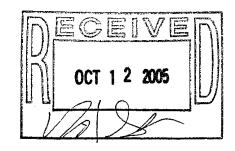
OEHHA, DHS and the Air Resources Board have prepared fact sheets on traffic-related pollutants for school personnel and parents that are available at http://www.oehha.ca.gov/public_info/facts/trafkids.html. The schools fact sheet recommends practices that schools near busy roads can follow to maintain healthful indoor air quality for students, such as limiting the idling of vehicles in parking areas, purchasing low-emitting school buses, and using high-efficiency filters in their heating, ventilation and air conditioning systems. The parents fact sheet contains suggestions for reducing exposure to traffic pollutants. These include: do not leave your car idling in the garage, avoid standing near idling motor vehicles when possible, and, for families who live close to busy roads, close doors and windows during peak traffic hours and set the air conditioner on "re-circulate."

OEHHA received \$600,000 in state funding to perform the two studies. OEHHA recently received \$216,000 in additional funding from the Air Resources Board to conduct a follow-up study involving additional analyses integrating traffic and air pollution data.

The Office of Environmental Health Hazard Assessment is one of six entities within the California Environmental Protection Agency. OEHHA's mission is to protect and enhance public health and the environment by objective scientific evaluation of risks posed by hazardous substances.

Janet Dunlap 915 Marvin Gardens Way Rocklin, CA 95765

October 10, 2005



David Mohlenbrok, Senior Planner City of Rocklin Community Development Department 3970 Rocklin Road Rocklin, CA 95677

RE: Notice of Preparation of Clover Valley Recirculated Environmental Impact Report

Dear Mr. Mohlenbrok,

My comments and questions regarding the NOP are as follows:

- 1. According to the guidelines of the Society of Vertebrate Paleontology, has a new evaluation of the valley floor by an independent paleontologist been completed and is it on file with the city? The Society of Vertebrate Paleontology states: "To assure compliance from the start of the project, a statement that confirms the sites' potential sensitivity confirms the repository agreement with an established institution and describes the program for impact mitigation..." this should be on file with the City of Rocklin and the contractors before work begins.
- 2. The Project Description declares 366 acres of "open space". What is actual "open space", not including streets, residential driveways, front and backyard landscaping and easements for drainage? Please provide an answer to this.
- 3. How will you prevent the "temporary stock piling" of soil on site from impacting the creek, wildlife, cultural sites, trees and native plants? Will the stockpile look like the dirt that is stockpiled at the intersection of Fairway Ave. and Pleasant Grove Ave.? Please provide an answer to this.
- 4. "The construction of Valley View Parkway will require 'cuts' of 60 feet into the side slopes and 'fills' of 60 feet." What guarantees will be provided that these hillsides will not be destabilized? Please provide a report on this issue.
- 5. "The estimated number of trees to be removed for the construction of the proposed project is 7,422." Will any of these be Blue Oaks or other varieties that are on the decline in quantity? Please provide an answer to this.

- 6. Regarding the stone walls that are slated for removal: When were they built and by whom? Have they been assessed by a Native American archaeologist? Please provide a report on these and their historical significance.
- 7. What undiscovered Native American sites remain and when was the last complete survey of the valley floor done? Please provide a report on the discovered Native American sites and a complete archaeological survey of the entire valley floor.
- 8. What will the impact be on property values of the homes along the Whitney Oaks/Park Drive corridor when traffic increases due to Valley View Parkway? With the Valley View Parkway model in mind, please provide a new evaluation of home resale values along the Whitney Oaks/Park Drive corridor by two or more real estate assessment companies.
- 9. What is the true projection of the number of vehicles that will be coming to and from the Lincoln/Loomis areas through Stanford Ranch via Valley View Parkway and Park Drive on a daily basis? Please provide a report on this.
- 10. What are the projected traffic related injuries and deaths for children and seniors crossing Park Drive to get to three different schools and shopping, respectively, in Stanford Ranch? What studies have the City of Rocklin done? Please provide information on these studies.
- 11. What impact will thousands of more vehicles have on air quality and asthma rates in Rocklin? What is the estimated increase in particulates from these vehicles on hot, windless days in the Stanford Ranch and Clover Valley area? What will be the cumulative effect from the increase in particulates on air quality? Please provide a report on these issues.

The City of Rocklin should look at "no development" as an environmentally superior alternative and should develop a means to make this valley into an open space park with bike trails and a Native American Interpretive Center.

A goal of moving the State Indian Museum from its present location in a flood plain in Sacramento to Clover Valley would not only add to the city's prestige but to our property values. It should be factored into the new downtown development as a community educational attraction bringing tourists and schools to Rocklin restaurants and shops.

A declaration of eminent domain would be all it would take to secure all of these benefits to our city.

Janet Dunlap

Janet Dunlap

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

COMMENT FORM

To be added/corrected on our mailing list and to document the author of comments received, please provide the following information. Thank you.

Name: //eleves treeby
Address: 3118 Clarkson Dr. Kochlin
Organization: N/A
Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.
T / 2 the impact
I am very concerned about the impact
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ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

OCT 1 3 2005

COMMENT FORM

To be added/corrected on our mailing list and to document the author of comments
received please provide the following information. Thank you.
Name of the Alexander
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Address: 2300 Delegar Ct.
Organization:
Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.
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ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

COMMENT FORM

To be added/corrected on our mailing list and to document the author of comments received, please provide the following information. Thank you.
Name: Frank M. Hallagher
Address: 2300 REBECCO CT.
Organization: S.I.R.
Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005 .
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and attach necessary postage)

Date: October 7, 2005

From: Edward Gantt

3603 Amethyst Drive Rocklin, CA 95677

To: David Mohlenbrok, Senior City Planner Community Development Department 3970 Rocklin Road Rocklin, CA 95677 OCT 1 1 2005

Reference: Proposed Clover Valley Lakes Development

Dear David:

Please do whatever you can to help preserve the ancient Indian grounds for posterity.

One thing that could be done is to make an historic park out of it with the help of the State of California or the U.S. Government Department of Interior.

For official purposes:

"As your recently circulated Notice of Preparation (NOP) states, the City can elect, Under CEQA law, to vote "No Project". With the many strong reasons not to develop, you should request the City Council of Rocklin to strongly consider this alternative."

Sincerely,

Edward A. Gantt

Edward a. Sautt

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ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

OCT 1 4 2005

COMMENT FORM

To be added/corrected on our mailing list and to document the author of comments received, please provide the following information. Thank you.
Name: Candale Garcia
Address: 12108 Persimmon Tenace Auburn ct
Organization: Ind. Assoc. Prefaid Legal Sentices
Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.
Please lot us preserve
Dome of the natural beauty
In our area!
Leone Mover Vallan alone!
Dudne Harcia.

Environmental Impact Report (EIR)

Scoping Meeting

Comment

Kelly Gawel

5210 Whitney Blvd

Rocklin CA 95677

k-meanders@hotmail.com



I would like to ask the proposed developers to think of their fondest memories of childhood. I doubt that anyone of you would deny the fact that part of what makes growing up, and living in general, worthwhile is knowing that there are certain places that one can go to escape from the sometimes suffocating demands of existance. I will go out on a limb here and say that these special places are indeed vital saving graces to any complete person. I apologise for bringing this to an emotional level, but would you dare deny any child this formative experience? I dont know if you have been to Rocklin latley, but I don't think I am exaggerating when I say that we are *seriously* lacking in special places. I am only in my early twenties now but even when I was a child there were still a few undeveloped patches where one could find relative solitude near a relatively unpolluted stream in order to have those free and natural moments that any child needs for their development. Those small patches have virtually dissapeared. Can we as a community claim a quality of life when our children's formative years are confined to concrete and Mc Donalds?

Now imagine what saving Clover Valley would say about us as a community. Even as a selling tactic alone! Imagine the oppurtunity it could offer our children. I'm sure that you can appriciate the deep intreague that Native American history sparkes in all of our minds as children. Would you dare to cover such a fascinating history with concrete? Wouldn't you be proud to say that you helped preserve such a rich and special place? Even if it is just a small patch of land that is worth a lot of money, it is also the last stand of what used to be a beautiful area. It would speak volumes if we could say in the future that we were able to have the foresight to preserve such a special place. If we save Clover Valley, we can perhaps save the last frontier in a sea of surburban sprawl. We cannot measure now how valuble this could be for the vitality and integrity of our community in the future.

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

COMMENT FORM

To be added/corrected on our mailing list and to document the author of comments

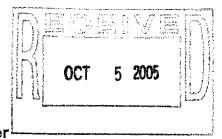
OCT 1 4 2005

received, please provide the following information. Thank you. Name: Melani Haas Address: 1098 Woodare KOaks 3608 Roseville Ca 95747 resident Organization: Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.

Planning and Development Department CITY OF ROCKLIN 3970 Rocklin Road

Rocklin, CA 95677

Attn: David Mohlenbrok, Senior City Planner



October 5, 2005

Re: Clover Valley Lakes Development Scoping Meeting October 5th

We are residents of Springfield Senior Community in Rocklin through which Park Drive runs, virtually dividing it in half. As concerned citizens and <u>voters</u>, we object to the development of Clover Valley because of the negative impact of the <u>additional 16,000 to 20,000 cars per day</u> this project and its 4-lane "parkway" from Sierra College to Park Drive will have on our city streets and air quality. This will seriously affect our health by reducing the already poor quality of our air, lower our property values, and increase the danger to our citizens on their own streets. Trucks and other through-traffic already routinely exceed the 40mph speed limit and run the <u>one</u> stop sign and cross walk at Crest Drive and Park.

The threat to our health and safety is not our only concern. Once this last vestige of natural beauty, wildlife sanctuary, and living history is paved over by the concrete of house foundations, streets, tennis courts, and shopping parking lots, it can not be retrieved. It will be too late for you to do anything but say to the voters "We made a mistake". We also believe the loss of wildlife, damage to the stream and wetlands, loss of trees and historical sites (some of which date back 7,000 years or older than the pyramids of Egypt according to the Peak Report) is a tragedy. We have no faith in developer promises, and as responsible citizens can not stand silently by and do nothing.

<u>Please</u>, do the right thing and exercise your right to recommend a "No Project" City Council vote, as allowed by CEQA law, for the Clover Valley Lakes Development!

Respectfully,		
JAMET MAJALEI	Janet M. Walle 1 3917 C	Coldwater Dr., Rocklin, CA 95675
Printed Name	Signature	Address
A 0.	- A 1 (M (1 1831)	A Committee of the second
ARKEME M. HOXIE	I believe M. Hade 1404	Silver Star Ct. Rocklin, CA 95675
Printed Name	Signature	Address
JAMES D. HOXIE	1 Jany 6 / XOTA 404	/Silver Star Ct. Rocklin, CA 95675
Printed Name	Signature	Address
2 , 1	B 1 that	Silver Star Ct Pocklin CA 95675
BARKANA HEATT	Parker Herry 1 4001	Silver Star Ct. Rocklin, CA 95675
Printed Name	Signature	Address

More signatures on the back.

LIST OF GOVERNMENT AND AGENCY OFFICIALS TO BE CC'D WITH COPIES OF THIS LETTER

Peter Hill, Mayor 3970 Rocklin Rd.

Rocklin, CA

Kathy Lund

ROCKLIN CITY COUNCIL 3970 Rocklin Rd. Rocklin, CA 95677

Ken Yorde

ROCKLIN CITY COUNCIL 3970 Rocklin Rd.

Rocklin, CA 95677

Tom Cavenaugh

ROCKLIN CITY COUNCIL ARMY CORPS OF ENGINEERS 1325 - J Street, Rm 1480

Sacramento, CA 95814

Brett Storey

ROCKLIN CITY COUNCIL

3970 Rocklin Rd. Rocklin, CA 95677

Tom Cosgrove, Mayor LINCOLN CITY COUNCIL

640 - 5th St.

Lincoln, CA 95648

Robert Weygandt, Chairman PLACER COUNTY BD. OF SUPV.

175 Fulweiler Ave. Auburn, CA 95603

George Magnuson

ROCKLIN CITY COUNCIL

3970 Rocklin Rd. Rocklin, CA 95677

Walt Scherer, Mayor

LOOMIS TOWN COUNCIL

6140 Horseshoe Bar Rd. #K

Loomis, CA 95648

Gina Garbolino, Mayor ROSEVILLE CITY COUNCIL

311 Vernon St. Roseville, CA 95768

Doris Matsui, Representative

STATE OF CALIFORNIA 501 - I St., Ste. 12-600

Sacramento, CA 95814

Jeff Darlington, Executive Director

PLACER LAND TRUST

P.O. Box 9222. Auburn, CA 95604 Jim Holmes, Supervisor

PLACER COUNTY BD OF SUPV.

175 Fulweiler Ave. Auburn, CA 95603

John Doolittle, Representative

STATE OF CALIFORNIA

4230 Douglas Blvd., Ste. 200

Granite Bay, CA 95746

Olem Zirkle, Conservation Manager **DUCKS UNLIMITED, Regional Office**

3074 Gold Canal Dr.

Rancho Cordova, CA 95670-6116

City of Rocklin Community Development Department Douglas & Marene Hammitt 4031 Silverstar Court Rocklin, Ca. 95765

3970 Rocklin Road Rocklin , Ca. 95677 c/o David Mohlenbrok

David Monienbrok 0CT 7 2005

Dear Mr. Mohlenbrok,

I want to express my great concern about the development of Clover Valley. The proposed development plans will have a very negative impact on this beautiful and historic valley with it's cultural history dating back over 4000 years!

This is truly a remarkable "prize" to retain for Rocklin as a whole for many generations to come. Development would forever eliminate the possibility of the community exploring and enjoying the history and cultural experience this wonderful valley provides.

Development and housing should not destroy significant historical and cultural sites which would greatly benefit future generations and enhance their living experience. The city of Rocklin should seriously consider preserving this exceptional landmark for the benefit of the community rather than have financial interests usurping the greater benefit to the citizens of Rocklin.

The long term benefit of a serene and beautiful valley being preserved in place of another "housing development" is incomparable.

The greatest environmental impact is just the altering of the natural beauty of the valley and creek! Development will obviously bring the increased noise, traffic, reduced air quality and more congestion to our neighborhood.

We have lived in the Springfield community for four years and are avid walkers and hikers. We almost daily walk along Park drive above Clover Valley and have greatly appreciated its wildlife, vegitation, and serene beauty. Our home backs up to Park Drive and the thought of having the proposed valley view parkway developed is frightening with the amount of increased traffic coming from Sierra College Blvd. Through our relatively quiet neighborhood. The construction phase impact for four to five years would be very disturbing in many ways.

We obviously oppose this development for the negative impact it will have on our quality of life but more importantly I think the City of Rocklin should seriously consider the greater good for the citizens of Rocklin and what it could provide for them in the future. I hope other options can be considered to preserve this cultural and historical "Gem"!

Sincerely,

Douglas and Marene Hammitt

Marene Hammi

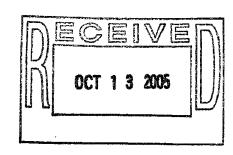
October 13, 2005

David Mohlenbrok,
City of Rocklin
Community Development Department

Re: Clover Valley 2002 Draft EIR

Dear David,

Please include a response to the following in the Clover Valley Recirculated EIR.



Air Quality

The Draft EIR states cumulative air quality impacts of any or all construction and development within the City Rocklin will contribute to the long term cumulative air quality impacts and these impacts would be significant and unavoidable.

- Is the overriding consideration of the California Environmental Quality Act (CEQA) the public health and safety?
- 2. Identified in 4-8MM-2b are measures intended to provide a 40-percent offset of new emissions. Is the position of the City 60-percent increase in new emissions is an acceptable standard? Are these measures requirements or just suggestion that may or may not be implemented?
- During the last five years how many projects (approved by the City of Rocklin) have fully complied with the measures mentioned in 4-8MM-2b?
- 4. Does the determination that the impact on air quality cannot be mitigated too less than significant and is unavoidable fulfill the lead agency's obligations to comply with the goals of the CEQA?
- 5. Will the new rules adopted by the Placer County APCD on idling construction equipment be used on this project, or will Rocklin enforce the general rule mentioned in 4.8mm-1b "idling should be kept below 10 minuets?"
- 6. What measures has the City implemented to decrease vehicle emissions to less-than-significant?
- 7. Has the City of Rocklin made any effort to determine at what point the decrease in air quality would make the health of residents the overriding consideration for approval of a project?

Transportation and Circulating

The following statements are found on page 4.7-17 of the Draft EIR

"Because the Improvements to Sierra College will be funded and constructed through the program implementation of the South Placer Regional Transportation Authority, and the cumulative traffic impact on Sierra College Boulevard from the buildout of the Clover Valley Lakes project and surrounding area would be considered less -than significant impact."

The next paragraph includes, "however, because portions of Sierra College Boulevard and portions of the improvements are outside Rocklin's jurisdiction and in the Town of Loomis, the impact is considered, significant and unavoidable.

Would be correct to conclude from these statements the impact on Sierra College Boulevard from buildout of Clover Valley could be significant?

Public safely

- 1. Taking into account the distance from the closet fire station (if the new station is not in place), to the furthest location on the project, what is the expected minimum response time be for large fire trucks to respond to emergency calls
- 2. If it was necessary for large emergency equipment to use the Valley View Parkway would the grade on any portion of this roadway create any problems for large emergency vehicles or decrease response time to more than the fire department considers acceptable?

Gordon R. Havens 4035 Kannasto St. Rocklin, CA 95677

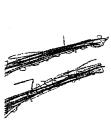
To the Planning Dept.: Clover Valley is a flawless pearl of what Places Valley used to be. Since we moved here 6 years ago, we have witnessed one after another of the natural areas cut up and developed. We are becoming another San Jose, which we moved to Rock lin to escape. We need Vover Valley to be set aside as a permanent nature prevenue. It is too perfect not to protect. 11) SEE IVE Yours truly, OCT 13 2005 Mr. + Mrs. James Herrera 3685 Mtn. View Dr. # 2 Rockin, CA 95677

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

COMMENT FORM

OCT 1 4 200

To be added/corrected on our mailing list and to document the author of comments received, please provide the following information. Thank you.
Name: Lindsey Ho Young
Address: 4875 Roddin, Rd. Apt 106A Rocklin, CA 95677
Organization: [Nd?vidual My phone is a (916)508-3435
Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.
585 homes are planned to be built on the Clover Valley tributary, and the Attresm. Native American Artifacts will be destroyed and forgotten tolking from Placer County's wich environmental culture. The Redord Oaks and territage Caks, which are protected by the Oak Tree to ordinance for our area. 28,000 trees reside on the production and 700 of these trees will be cut down due to the potential new developments. A variety of wildlife including cryoter bequer teer; fish and crustaseans live peacefully on the site. Please consider preserving the environmental site of Clover Valley. I live in Rocking and want to be able
to enjoy the area for years to come hank you



October 5, 2005

My name is Charlotte Howell and I reside in the Springfield Adult Community in Rocklin.

I am writing this letter to voice my opinion on the plan to develop Clover Valley. I am very against such a plan for several reasons.

There are so few places of natural beauty left in our area. Clover Valley should remain a place that everyone can enjoy. No matter how many restrictions are put on developers, the fact remains that homes and businesses will pollute the area.

Traffic is also a concern. I live just off Park Drive and don't want to see it become a major thorough-fare. There are already problems with speeding and more traffic will mean more speeders. I also don't want to have to wait forever just to turn onto Park Drive from my home.

I would like to see Clover Valley become a nature sanctuary with a Native American Museum.

Our children and grandchildren deserve the chance to have one unspoiled area in a world where profit comes before anything else.

Sincerely,

Charlotte J. Howell

3924 Coldwater Drive

Rocklin, CA 95765

916-435-9595

charlottehowell@sbcglobal.net

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

COMMENT FORM

To be added/corrected on our mailing list and to document the author of comments received, please provide the following information. Thank you.

Name: JOHANN + GERTRAUD HUBER
Address: 280 WINCHESTER CT. ROCKLIN CA
Organization:
Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005 .
After reviewing the map of Clover Valley at City Hall, We think the Valley should be preserved for the citizens
We think the Valley should be preserved for the citizens
of Rocklin as a History Park We can't just pave
everything everywhere.
If you look around Rocklin, they are building now
homerand skopping centers all over
Leave some space for the future generation.
The Valley could be used for daytime hiking.
NO overnight comping.
This way all the wildlife won't be disturbed
To much either.
Besides that the Valley will be also polution
and traffic free.
So, we say please save clover Valley.
· · · · · · · · · · · · · · · · · · ·
John Huber
- GWand Huser
(Prior to mailing this form, please fold form so that address on back is clearly visible,
and attach necessary postage) OCT 1 4 2005

City of Rocklin Community Development Department 3970 Rocklin Road Rocklin, CA 95677

Attention: Mr. David Mohlenbrok

Subject: Comments on the Clover Valley Development Project

Dear Mr. Mohlenbrok,

We live on Tahoe Vista Dr in the Springfield Community of Rocklin. I believe these comments represent most of the residence located on Tahoe Vista Dr and we will be most directly affected by the Clover Valley Development Project.

First, let me cast our vote and urge the City of Rocklin City Council members to vote a NO PROJECT for this development. The following are obvious reasons:

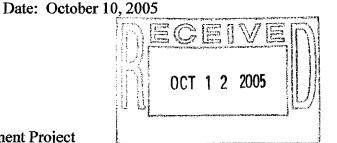
- Loss of air quality
- Increased traffic congestion
- Disruption to citizens with the proposed sewer development
- Increased crime potential
- Increased noise pollution
- Impact on Oaks Woodland and Wild Life
- Loss of valuable wetlands and a year round stream
- Loss of 7000 years of continuous history of California's earliest residents
- Loss of an opportunity for a regional history park or preserve

It would be a terrible loss of a most pristine area with many of the natural wild life existing in the valley.

But other considerations directly affecting us on the Tahoe Vista Dr location would be taking away the view of the Sierras directly east of our properties. Home sites scheduled for the proposed Sierra View Dr area would distract from our view. If the project does go through, it is strongly encouraged to limit the new homes to a low profile single story structure so all of us can enjoy the spectacular view. Also those proposed homes will be within several hundred feet of the Southern Pacific Rail Road tracks, tracks where up to several trains pass hourly and blast their horns very loudly, especially around 3 and 4 A.M.

Most of us have moved here to retire. That means, we have limited time left and if the project goes through, we would be subjected to continue noise and air pollution for the next, let's say 5-7 years, during construction. There is already too much noise pollution, and this would add considerably to the existing noise.

Increased traffic would occur during and after completion of the project. It has already been noted in the past by Springfield to limit the construction vehicles not to use Park Drive, but to use the Sierra College connection for all construction traffic.



Please consider these comments in your planning and decision making process. It would be especially considerate if Rocklin retained this pristine piece of land and a historical preserve in lieu of turning it into more home and commercial sites.

Sincerely, Wellar of fluir Letter

William and Sharon Ireton

4135 Tahoe Vista Dr Rocklin, CA 95765

916-435-1473

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

COMMENT FORM

OCT 1 4 2005

To be added/corrected on our mailing list and to document the author of comments eceived, please provide the following information. Thank you.
Name: Marina Jaramillo
Address: 18680 Blue Sky Chi
Organization:
Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.
I think that it is very important to maintain areas for recreational use particularly those areas which are filled with natural beauty, as well as those like clover Valley which impacts the environment significantly the preservation of these areas will enhance land values, as nature is the preservation of these area, obviously as the present of environmental winds as well as being desirable to the people who lives here. In addition to those reasons, which should be entirely sifferent, there are Indian the clover valley is impacted to our past, our present, and our future.

3921 Dawn Dr Loomis, CA 95650-9749 October 13, 2005

Attn: David Mohlenbrok City of Rocklin 3970 Rocklin Road Rocklin, CA 95677

RE: Notice of Preparation for the Clover Valley Recirculated Environmenatl Impact Report

Thank you for the opportunity to comment as a Placer County resident on the Notice of Preparation (NOP) for the Clover Valley Recirculated Environmental Impact Report (REIR).

Please analyze "mitigation bank" opportunities that could materialize with Clover Valley's 622 acres of natural and cultural resources, including but not limited to wetlands, woodlands--especially blue oaks, wildlife and their declining habitat, prehistoric sites, etc.

Please identify and analyze impacts to wildlife corridors, critical fawning areas, coyote dens, and other animal and aquatic resources especially with the fragmentation as evidenced in the maps presented.

The City of Rocklin is to be commended for signing on to the Greenprint regional program which recognizes the benefits of urban forests and endeavors to double the region's tree canopy over the next 40 years. In the new NOP, please analyze air quality, water quality, energy savings, real estate and business benefits from oak trees specifically in light of the proposed project's planned oak tree removal and subsequent replanting with trees that require regular irrigation with finite water as well as maintenance and Greenprint/blueprint principles.

With the common understanding that development impact fees often do not recoup entire short-term costs (especially with incentives) plus long-term costs (infrastructure maintenance, emergency services, schools, etc.), please analyze long-term <u>full fair</u> share costs—the cost of community services assessment for recent and new developments—10 years, and/or 15 years out.

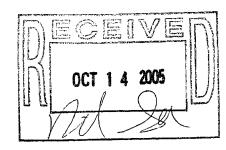
Please analyze impacts of a **NO** parkway alternative with public transportation system(s) instead, and/or an extension of one of the proposed development's north roads on to the public road known as Creekside Road at the northern boundary of Clover Valley.

Please consider all benefits of creating a 622-acre preserve. Pursue developer/owner options of infill development on vacant lands that currently exist within Rocklin City limits.

Sincerely,

Marilyn Jargen Marilyn Jasper

Attachments—Comments from previous DEIR August 2002.

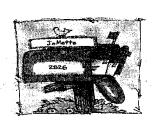


ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

COMMENT FORM

OCT 1 4 2005

To be added/corrected on our mailing list and to document the author of comments received, please provide the following information. Thank you. Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.





Darrell Jome & Betty Mette-Jome

2826 Springfield Dr. Rocklin, CA 95765 (916)415-9004 fax (916)415-9004 cell (916)316-7231 e-mail BL Mette@aol.com

October 3, 2005

David Mohlenbrok
Community Development Department
3970 Rocklin Road
Rocklin, CA 95677

Dear David;

I am writing to you to say "Save Clover Valley". Our reason is air pollution and traffic. We have lived in Rocklin sense 2000 and call this our retirement home. Please help us to keep Clover Valley free of homes and let the trees live.

Respectfully,

Darrell Jome and Betty Mette-Jome

David Mohenlenbrok Community Development Dept. 3970 Rocklin Rd. Rocklin, CA 95677

Attn: Mr. Mohenlenbrok:

I have learned of the Clover Valley Project and wish to strongly object to it. When I moved into Rocklin four and one-half years ago, the valley air was clean and breathable. In just that short time I can no longer open my windows due to the vehicle smog except during the hours of 9:00P.M or before 6:00A.M. I live just off of Park and Sante Fe Sts. I have had to purchase an Ionic Breeze Air filter and when I first used it I needed to clean it only about once a month. Now, even with my windows closed most of the time, I must clean the filter every week and it is not dust that is collected but a black oily substance. My countertops get little black spots on them and if I try to wipe with only water it becomes a black greasy smear which must be removed with a degreaser. All of this is due to the high vehicular traffic on Park & Sante Fe Sts. My understanding is that with the development of Clover Valley there will be a highway cross town in Rocklin and connecting to Park St. adding another 16,000 cars to Park St. The air and noise pollution this will cause will make life unbearable in this valley.

I know that the City Council is more interested in revenue than the health of its citizens, but that is pure greed! The developer will not live here and will not care about the health of Rocklin's citizens. We put the Council into office and We can excerise our vote to change a Council that has become more beholden to a developer than the Citizenry.

If you doubt the validity of my claim to the much increased smog in Rocklin, I suggest that you take a ride to Auburn on a hot windless day and upon your return you can view the brown/grey cloud that hangs over Rocklin already. The Clover Valley project will turn this originally pristine valley into another Los Angeles.

Yours truly, Florence tendal

Florence Kendall 207 Villa Serena Cir.

Rocklin, CA 94765

10/4/2005

Clover Valley Project

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

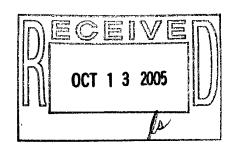
COMMENT FORM

received, please provide the following information. Thank you.	nments
Name: MARY JANE LAWLER	·········
Address: 5859 DEVON DR ROCKUN 95765	_
Organization: HOMEDWNER	_
Please provide us with your written comments on the scope of the EIR by 5:00 postering the comments on the scope of the EIR by 5:00 postering the comments on the scope of the EIR by 5:00 postering the comments on the scope of the EIR by 5:00 postering the comments on the scope of the EIR by 5:00 postering the comments on the scope of the EIR by 5:00 postering the comments on the scope of the EIR by 5:00 postering the comments on the scope of the EIR by 5:00 postering the comments on the scope of the EIR by 5:00 postering the comments on the scope of the EIR by 5:00 postering the comments on the scope of the EIR by 5:00 postering the comments of the comments of the EIR by 5:00 postering the comments of the comments of the EIR by 5:00 postering the comments of the	pm,
I find the following asperts of the proposed Sevelopment I deling in consideration of what is best for Rocklin.	projec
Della What were you thinking of any accesses show along a north-South orientation, Do not allow Park	Id he
Desome the short-cut between Sieva College Blod E. D Cutting down 25 % of the existing trees is an unacce action. Trees movide some cleanuing of the air pollution	RE 6. eptable
which is bad now & would be many times more with homes and cans but many fewer trees. Newly planted to are D no help!	
3) The Ristory & cultural value of this area deserve to be sweeted & Cherished, This aption will be a Paste	<u>2</u>
Revitage to future generations. There can be no greater gift to our Riers.	—) — —
The einknown impact on the heautiful creek & essociated wetlands. Make this area a park not a parkent	<u>-</u>
Prior to mailing this form, please fold form so that address on back is clearly vis and attach necessary postage)	
ALON STANDARD CO.	And the second s

Lisa & Stephen Loebs 4633 Durham Rd. Rocklin, CA 95765

October 11, 2005

David Mohlenbrok City of Rocklin Community Development Department 3970 Rocklin Rd. Rocklin, CA 95677



RE: Notice of Preparation Clover Valley Recirculated Environmental Impact Report

Dear Mr. Mohlenbrok,

Thank you for addressing the following concerns that we have regarding the proposed development of Clover Valley.

- As stated in the NOP, "the project also includes an encroachment into the 50-foot creek setback area along Nature Trail Way at two locations." Does this allow for proper flood control in heavy rainy seasons? Does this also protect Clover Valley Creek from contaminated run-off from fertilized lawns and urban uses? Please provide a thorough report regarding these issues.
- 2. Regarding the construction of an off-site sanitary sewer extension, where exactly would this "off-site" sewer extension be located? How visible will it be for Rocklin residents? What are the potential hazards of this kind of structure to the environment and local community? Please provide a complete analysis of this to the Rocklin Community including the exact location and size of the structure. If an on-site sewer is considered as an alternative, please provide an analysis of its size, location, and its potential hazards to the environment and local community.
- 3. The NOP states that "the estimated amount of earth to be moved in association with the above construction activities is approximately 1.6 million cubic yards...the project may also include temporary stock-piling of the soil on-site for future use." Please provide information on where exactly this earth is to be stock-piled and please provide information on the impact of that stock-piled earth on the creek, wetlands, local animal habitat and natural flora.
- 4. "The construction of Valley View Parkway will require 'cuts' of 60 feet into the side slopes and 'fills' of 60 feet." Please provide a report on how these 'cuts' will effect the integrity of the hillsides (ie. erosion), and a report illustrating how these 'cuts' and 'fills' in the hillsides will look.

- 5. "The estimated number of trees to be removed for the construction of the proposed project is 7,422." What percentage of these trees are California Blue Oaks? Please provide information on every type of tree that is slated for removal. California Blue Oaks are declining in natural regeneration; please provide a study on the decline of naturally regenerated California Blue Oaks, the approximate age of each tree slated for removal, and how these Blue Oaks contribute to watershed protection and preserve an important component of the eroding biodiversity of California.
- 6. The NOP contains information on projected "open space" to be preserved in the valley. Please provide information on what this "open space" consists of and how much of it will be usable by the citizens of Rocklin.
- 7. Aesthetics: Please provide to the community of Rocklin a time line and standards for revegetation of removed flora and trees.
- 8. The NOP states: "A discussion of mitigation for removal of the stone walls existing on the site." Please provide a report on the historical significance of these stone walls, and include in your report how old the walls are, who built them, and what historical significance they have for Rocklin.
- 9. Transportation and Circulation: Please include in your analysis the increase in traffic noise from the increase in traffic that will occur with the construction of the Valley View Parkway connector. Please provide information on a before and after study of decibel levels through all residential areas along Park Drive beginning from the proposed Valley View Parkway to Sunset Blvd.
- 10. Air Quality: Please provide a report on the percentage of Rocklin residents who currently suffer from Asthma and other respiratory illnesses due to poor air quality, and how those numbers may increase due to higher levels of ozone exposure and pollution from the increase in vehicles entering and leaving the valley. What are the expected increases in ozone levels? Please provide projection of how the air quality in Rocklin is expected to be in the next 10, 20, and 30 years.
- 11. Cultural Sites: Please provide a <u>complete</u> cultural report of the entire valley floor of Clover Valley. Please include in that report the number of historical relics found, the number of grinding stones found, the number and detailed descriptions of dwelling sites, petroglyphs, and the complete count of Native American bodies buried in the entire valley. Please do a complete palaeontology study and list any fossils or bones founds in the valley. Please notify the Rocklin citizens of what will be done with the Native American human remains, artifacts and pre-historic fossils that are found in the valley.
- 12.Please provide archaeological reports from at least 2 separate archaeological agencies surveying the entire valley floor to ensure a fair and thorough study.
- 13. Please provide an analysis of heavy metals that may contaminate the creek waters and

groundwater from residential run-off, what those heavy metals could do to the creek water and the health of the Clover Valley residents, and what the plan is to safely dispose of those metals.

14.Please provide an assessment from at least 2 certified real estate assessment companies of the impact that the proposed Valley View Parkway will have on property values along the Park Drive corridor.

Discussion of Alternatives:

As 15-year residents of Placer County and almost 12 years here in Rocklin, we would like to see our Clover Valley land be put to a better public use. All great cities in America have preserved at least a small part of their land for beautiful parks and/or preserved open space. We have an opportunity to become a great city!

When we moved into Stanford Ranch in 1994, part of the sales pitch made by the real estate agent in the model home was that The Oaks had planned for walking-jogging-biking trails and that it would provide a higher quality of life. We loved the idea. Later, The Oaks went bankrupt, another company bought the land and the development plan appeared to have changed to Whitney Oaks golf course and surrounding gated communities. We don't know if the real estate agent lied and the public-use trails were a fiction or if the plans changed at the city level – probably a little of both, right?

However, here we are again at a time of opportunity with city officials being asked by a large number of its citizens to tell the public the truth about plans to develop the last large piece of beautiful Rocklin land and to consider a better public use of that land.

We have an unusual opportunity with a wealthy Indian tribe that has interest in buying and preserving the land. They have made multiple offers to the land-owning group to no avail. While Rocklin city officials declined the invitation, an outdoor meeting attended by the top city officials of both Loomis and Lincoln spoke of contributing funds for a regional park at the site. What makes this opportunity so unusual is the multiple sources of funds from outside Rocklin that is already available to purchase some or all of the land for a better public use.

Ideally, the land would be purchased by those offering in partnership with a public land trust. Rocklin's citizens deserve the opportunity to not only receive the WHOLE truth about the environmental and cultural questions raised by this letter, but to also enjoy a public park and preserve that adds value to their experience here as well as the likely increase in real property values that homeowners of great cities enjoy.

Best regards,

Lisa and Stephen Loebs

Steadle 5445th

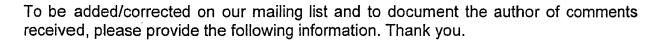
916-632-9939



ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

COMMENT FORM

OCT 11;



Name: Liese Loon-Stern
Address: R404 Cody Court Rocklin, CA. 95765
Organization: A concerned resident of Rock Lini
Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.
1.) Importance of preserving Historic Sites.
2) The building of 558 homes with new roads with add to more traffic which is abready heavy.
3) Loss of trees wildlife and general open spaces.
H.) Increased use of water including the maintenance of private Lawns and plants, trees etc.
5) The impact on the Chover Vahley Creek may be very detrimental.
by The open space altocated is minimal in compation with the space taken up by houses and commercial spaces.
Ti) The open spaces we have now make this area so beautiful!! Save it!

(Prior to mailing this form, please fold form so that address on back is clearly visible, and attach necessary postage)

Save Clover Valley

Comments on the NOP for Clover Valley Project, October 5, 2005

By

Tom McMahon

4431 Pebble Beach Rd. Rocklin CA 95765

Lessons learned from a study of local natural habitat
How development impacted Rocklin's ecology -- 1995 to 2005

When I moved to Rocklin the city's north boundary with Placer County was less than 100m from my front porch. The land toward Lincoln to the north consisted of open space - fields with scattered oak groves. This wild property provided a stable habitat for permanent families of owls, harriers hawks, wild turkey, pheasants, coyote, deer, humming birds, native snakes and huge vole populations.

I also studied several natural springs that supported native aquatic wildlife and had flowing water year-round even in the driest years. I documented, photographed and reported the existence of these springs to the Rocklin Planning Commission. The authorities said these resources were unimportant and should not be preserved. Since recent development has dramatically changed local topographic contours and developers have installed large-scale drains this area's springtime water flows have diminished virtually destroying a habitat for frogs and other native aquatic species.

After Rocklin's annexed the Placer County land and development proceeded the following has occurred within a three-mile radius of my home:

- Permanent owl nesting places in nearby oaks are gone. The food supply of voles, snake and other animals has diminished significantly or disuppeared
- Voluminous harrier hawk population has disappeared for the same reasons
- Large population of wild turkey are gone
- Coyote families are gone
- Nutive snake populations have been decimated or destroyed
- Year-round natural springs that provided native habitat for fauna and flora have been destroyed by grading and artificial drainage
- Vole populations have been decimated
- Deer populations are gone except for occasional forays into protected areas

The people of Rocklin have a choice!

Develop Clover Valley and destroy our hometown's last sustainable natural habitat or preserve it and assure this treasure will continue to be our heritage.

CLOVER VALLEY SHOULD NOT BE DEVELOPED!

Clover Valley Project

ENVIRONMENTAL IMPACT REPORT	T (EIR) SCOPING MEETING
COMMENT F	ORM 0CT 1 4 2005
To be added/corrected on our mailing list and to received, please provide the following information Name:	to document the author of comments n. Thank your Loucument the author of comments
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Clover Valley Project

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING OCT 1 4 2005

COMMENT FORM

To be added/corrected on our mailing list and to document the author of comments received, please provide the following information. Thank you.
Name: Virginia Voran
Address: 1013 2858 Gass Valley, Col 95945
Organization:
Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.
There is southing seriously wrong whan all communities have become is appointmitias for
exploitation and when the citizens are maligness
Discontines to care we care shoved
aside so obstacles It is a pathetic
Thing is up & sale, even the lost
destroyed forever. This Ocis to trade-off- permanent dos g at notion's notional
theritage for explicitation and greed.
This is ar legacy + it is not one to be proval of God Bless America.

(Prior to mailing this form, please fold form so that address on back is clearly visible, and attach necessary postage)

ALL PERFECTLY FINE WITH ME, GO ANOW I HAVE NO OPINIEN ON WHAT ROCKLIN NCCODING HIGH RISE SKYSCRAPERS THAT I VERLUOK MY PENRYN PROPERTY, THAT'S CLOVER VALLEY. I DON'T CARE IF GNOTHER NEW YORK CITY IS BUILT THERE PLANS PACE FOR THE DEVELOPMENT OF OCT 1 2 2005 PET. CLONER VALLEY DEAR DAVE SIERNA COLLEGE BLVD. DECOMES YLAMES INCLUSING THE I BO OVERPASS , THAN IF AT SOME TIME IN THE FUTURE ACCESS WOUND DE ACCEPTABLE. AUTHEWAY TO ROCKIN RD. BUT NOT BETABLE

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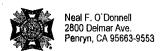
CITY TO SUCCED RUNDE ACCESS THROUGH

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THE PARKENT 2 LAWE MIND. IS A COUNTRY







Clover Valley Project

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

COMMENT FORM

To be added/corrected on our mailing list and to document the author of comments received, please provide the following information. Thank you. Name: Sarah Nix Address: 5240 Rockin Rd., Rockin, CA 95677 Organization: Resident Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005. The city council should stricusty consider the importancy building has an the environment before pulding. One thing Rocklin resident love about this city is the abundance of nature and willife. When you lose that, you lose the spirit of Rocklin. Also, the city should take extensive neasures to perserve Indian artifacts that are a precious part of this areas history.

(Prior to mailing this form, please fold form so that address on back is clearly visible, and attach necessary postage)

To:
City of Rocklin
Town of Loomis
Agencies, Organization listed in EIR dated 4/25/01 for Clover Valley Lakes Project

John & Marlene Norton Property Owner and Resident @: 3560 Creekwood Dr. Rocklin Ca. 95677
916 624-2786

Subject:

Proposed Development of the Clover Valley Lakes Project.

I have owned this property since 1988, built a new home and have resided here since 1994. I have seen and experienced what this Clover Valley Creek can flood and do damaged to homes under its **present** influence.

The sediment that has occurred with the minor development which has gone on up stream currently, let alone the Major Development Proposed by this new project.

As the City is well aware of the sediment problems and flooding with the existing development and the construction of the bridge over Clover Valley Creek on Creekwood Dr., the problems can only get worse. The city has cleaned out this sediment from these two large culverts twice in the past and has done nothing to the present condition which allows a small flow to pass under the East culvert and none under the West one. Past flooding conditions has raised the creek level to over the top of these culverts and eventually it will have to go over the street. (Creekwood Dr.) When it was cleaned out, a bob cat tractor could pass under the culverts and kids would jump off and go swimming. Now if they tried it, the would break their necks as there is no water and only a three foot clearance to sediment which has filled in the creek bed.

The pond down stream for the Whitney Golf coarse has also been filling with sediment and rumors that they may abandon it due to the high cost of cleaning the sediment from the pump intakes and locate the pond future downstream

The additional runoff from the proposed 32 acres of major roadways and addition from the development will have a major inpacked on Clover Valley Creek.

They plan retention ponds, but who will maintain them in future years when the developers have moved on to create more destruction?

The large number of Oak Tress which will be destroyed (4,000 to 7,000) can not be replaced in our lifetime. This should not be allowed to occur!

The proposed residential "cut" estimates of 633,200 Cu. yds and "fill" of 865,000 cu. yds and the streets would require estimate "cuts" of 144,500 cu. yds and fills of 81,900 cu. yds, plus an additional 143,000 cu. yds for future development.

The offsite sewer line which will be required down Rawhide, Midas and Argonaut and cross both Clover Valley and Antelope Creeks, affecting more existing Oak Trees will have a major impact on our area with traffic problems and noise.

Rawhide Rd has just recently been under major construction for storm drain construction from the development above - Whitney Oaks Dev. This street will be tore up again?

The new Valley View Elementary School up on the hill in the Whitney Oaks Dev. at the end of Creekwood Dr. and Rawhide Rd has been a major noise factor from the cut and large fill that they have done to accommodate this new school. The aesthetics from this major fill are terrible. Part of the high concret retaining wall was left exposed and the fill dirt has already started to eroded with out any provisions made to control it, and this is with out any major rains in the last few years.

If this is what the City of Rocklin permits on this smaller project, what will happen on a major cut and fill in the proposed large development?

What about new schools ??

I suppose they will come and ask us tax payers for another \$40 - \$45 millions like they already have in the past, \$40 mil. for the current high school, \$40 mil. for middle schools and now another proposed \$45 mil. for a new high school !!!

\$40 -

We bought and moved to Rocklin thinking it was a nice little town to retire in and would grow at controlled pace, boy were we wrong!!

Turning out to be just another large overgrown sprawling city run by developers who build these 5 and 6 bedroom homes and then leave us with the problems.

These concers are in addition to others which are effecting other individuals at the other end of the project in the Sierra College Blvd. area.

This Project should be Rejected !!!!

John E. Norton

Marlene Norton 10/5/05

Marlene Norton 10/5/05

SAVE CLOVER VALLEY

The Clover Valley Lakes developer proposes to build 933 homes and 5 acres of commercial buildings in one of the most pristine areas remaining in Rocklin. The upper Clover Valley Creek valley has many wild animals because of the extensive riparian and oak woodland areas. Remnants of the Native Americans that once lived here are evident in the grinding stones that still exist. If you look hard enough, you can envision what this land looked like hundreds and even thousands of years ago. Here's are some of the facts concerning this project:

- 935 Residential Homes and 5 acres of commercial buildings built on 622 acres of a unique valley
- Over 7,500 Oak Trees destroyed for the new houses, streets, and sewer line extension.
- Increased danger from downstream flooding due to wetland, tree and vegetation removal (1,126,200 cubic yards of dirt removed)
- Increased traffic from 11,310 daily car trips. A new 4 lane road > Park Drive connecting Park Drive to Sierra College Blvd. Adds traffic to Park Drive going through Springfield/Whitney Oaks and Stanford Ranch.
- Sewer Line Extension impacts homes along Rawhide, Clover Valley, Midas, Argonaut and Union. If only 180 homes were built a sewer line extension would not be required.

Please attend the public hearing scheduled for October 9, 2002 at 7:00 pm at city hall and express your opinions about this development.

Please visit the Clover Valley Foundation website at http://home.pacbell.net/csauce/CloverValley.html or call 315-8010 for more information.

We can make a difference!



SEDIMENT - UP STREAM
FROM CREEKWOOD BRIDGE



TAKED TO DAY 10-5-05

TROWN STREAM FROM BRIDGE



TAKEN TODAY

- ROOF

Cultural Sites

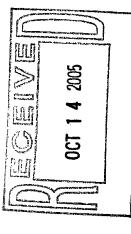
1. New Cultural Report for Clover Valley

report, 'A Determination of Eligibility and effect on Cultural Resources within the Clover Valley Lakes Project Area'), we believe it is occupied this valley and our town. We believe Clover Valley is the last of its kind in our region and within the top 5 feet of this valley the landscape for the construction of modern features will alter the setting, feeling and association aspects of integrity of the district." now lie in their natural unaltered setting, appearing much as it did in the prehistoric period of significance. Overall, the alteration of imperative for the good of our community and future generations to learn as much as we can about the culture and history that once is an ancient history dating back thousands of years, which remains in historical context. The Peak Report says, "Most of the sites Given the importance of the 33 pre-historic sites discovered in Clover Valley and their qualification to the National Register of Historic Places under criterion D, 'will provide information important in pre-history' (see page 65 of Peak and Associates

these sites for the Native Americans whose ancestors once lived and are buried here, but it is equally important to preserve these sites We believe Clover Valley should be researched thoroughly, using non-intrusive investigations. Not only is it important to preserve for the citizens of Rocklin, the state of Calif and the world. This history belongs to all of us and our future generations. To do anything less would be ahistorical.

Given the great significance of the cultural finds in Clover Valley we are requesting:

admission, that many of the sites were examined only in areas slated to receive direct impact due to the construction. Without further investigation we will never know if there are more sites to be discovered and what important information they may -A new cultural report for Clover Valley. We base this request on the January 2002 Peak and Associates report's own



would not be considered an impartial independent agency as they were originally hired and paid by 650 Ventures and provided the -We also request that the new cultural report is conducted by an impartial independent agency. Peak and Associates report to Gerry Kamilos, a representative of 650 Ventures. This would b a conflict of interest.

Rocklin, Ca 95677

Listed below we provide the:

- Page number of site description
- Site number
- Quote

Resources within the Clover Valley Lakes Project Area', that indicate these sites were only marginally explored. If sites were only All this information was taken from the Peak and Associates cultural report, 'A Determination of Eligibility and effect on Cultural marginally tested where residential lots, roads etc were being constructed, how many other sites remain to be discovered? We believe that all of Clover Valley needs to be surveyed even if it is not in the path of the proposed construction.

All the pre-historic sites below listed below qualify to the National Register as an Individual Contributor and were only partially explored:

"Only the central and western portions of this prehistoric period resource was "This is a fair indicator of the intensity of mortars - Also late period occupation second greatest number of bedrock subjected to test excavations ". 500AD to 1500BC the previous activity at this site Findings Age of Site Page Number ** Page 54 NRHP Qualification Individual Eligibility Resource CVL-7

the west." All indications point toward and the central and eastern area, away from Clover Valley Creek which lies to "This large site was only investigated material in the western portions with number of bedrock mortars - large and sediment. Burials - contained greatest along the margins (shovel test pits) highly organically enriched midden a very dense deposit of cultural 1850 ad to 2000 BC

Individual Eligibility

'The large resource was only minimally tested along the periphery of the deposit (proposed road constructions'. At one time marked by Plaque indicating burial ground - "This large resource was only minimally tested along the extreme northern portion during test excavations.	"Only the extreme eastern edge of this resource was examined during the test excavation as this was the only portion slated to receive direct impacts due to the construction of a proposed road". Large elliptical-shaped area with an associated deposit of cultural material - Likely one of the oldest sites	"This site was only test by means of shovel test pits as project redesign eliminated direct impact" (In other words, this site is important and needs more investigation) Concentration of Circular shaped depression along with two large depressions, thought to be ceremonial sites.
not Available	1850ad - 2000bc	Not Available
Page 46 & 60	Page 61	Page 62
Individual Eligibility	Individual Eligibility	Individual Eligibility
PA-98-103	PA-98-115	PA-98-122

**From Peak & Assoc - January 2002 Cultural Report, A Determination of Eligibility and effect on Cultural Resources within the Clover Valley Lakes Project Area'

2. Construction Setback from Cultural Sites

Based on the most current map provided, very little has changed to protect the 33 pre-historic sites that qualify to the National respect the reverence that these sites have to Native Americans, which include several burial grounds, ceremonial sites and rock art Register of Historic Places. We would hope that the city would not only have respect for thousands of years of history, but also

superimposed over the proposed development. We also provide a spreadsheet (identified as exhibit #11) showing the impact of this development to these sites and compare it to the previous information provided in the January 2002 Peak and Associates report (see Table 4: Project Effects Within Permit Area/Treatment - page 68-69 - 'A Determination of Eligibility and effect on Provided with this package is a map (identified as Map # 7), that shows all 33 pre-historic sites currently known, Cultural Resources within the Clover Valley Lakes Project Area').

Based on the previous Project Effect table from the January Peak report (Page 68-69), 24 of the 33 sites would be effected by the proposed Clover Valley Lakes Development by roads, residential lots, catchment basins, sewer lines, sidewalks and the infrastructure that goes along with a major housing development.

and general construction equipment that will go over these sites during construction of the sties infrastructure. Little or no mitigation begin to mitigate how development would affect the sites that are now in open space that will be impacted by the budozers, backhoes Using the most current information showing 558 homes (see Map #7), 22 of the 33 sites would be still be directly effected by catchment basins, sewer lines, sidewalks and the infrastructure that goes along with a major housing development. This does not has been done to preserve these ancient sites.

We request:

- -The city require a minimum set back of 100 feet on all sides for all 33 sites discovered and any future sites to be discovered.
- -- No construction activity to be performed within 100 feet on all sides of the 33 cultural sites discovered or future sites discovered
- -No Equipment or trenching or fill be places within 100 feet on all sides of the identified 33 pre-historic sites and any sites discovered in the future.

3. Proposed Construction Monitoring for Cultural Sites

thousands of years, Clover Valley is truly an endangered place. We not only need to protect the sites that exist in this valley but also Our history is important and we must preserve what is left. Twenty years ago, there may have been a few places like Clover Valley, rich in pre-historic sites. But today with our ever-expanding development that pave over our open spaces and history dating back the ones that may be accidentally uncovered by the proposed development.

We request:

-Independent monitoring by an archaeological firm (not Peak and Associates) along with a representative of the UAIC.

-We request that these representatives be on site at all times during construction.

The developer should absorb the cost of these services.

4. Release of Public Documents

accurate storey about the different cultures that once lived in our town thousands of years ago. We may be able to uncover the secrets of the past that will help us to learn about a people we know very little about. We won't be able to learn about this history if what is Clover Valley. Thousands of years of history remain intact within the top 5 feet of this valley. From this valley we can tell a more Save Clover Valley organization is dedicated to educating the citizens of Rocklin and the region about the pre-history that exists in found in Clover Valley if kept from the public.

about the incredible historical significance of Clover Valley. Let's take the veil of secrecy away and have an open dialog about these Peak and Associates to Sherri Abas - Oct 1999). Yet the city of Rocklin allowed a 12 year old cultural report to be cited in the DEIR Area'January 2002). If our group had not invoked the 'Freedom of Information Act', the people of Rocklin would have never known The city of Rocklin and its officials were aware that a more recent culture report for Clover Valley was being prepared (letter from (August 2002) passed out to the public, even though the most recent cultural report was available 7 months earlier (Peak and sites and not give the excuse of 'information on the sites cannot be release in the public documents' due to 'potential for Associates report, 'A Determination of Eligibility and effect on Cultural Resources within the Clover Valley Lakes Project vandalism'. It's been almost two years now and that just hasn't happened

As a member of the Save Clover Valley organization we are requesting:

- -We are informed about how the development will affect all the cultural sites.
- - We request to be part of the decision making process for these sites
- -What the long term protection plan and preservation plan will be for these sites.

-Maps that show how the proposed development will affect the existing pre-historic sites.

The Save Clover Valley Organization has already been granted 'consulting party status' by the ACOE for the Clover Valley Lakes Development, which entitles the members of our organization to "share our views, review and receive pertinent information, offer ideas and consider possible solutions together with other agencies and consulting parties" (http://www.achp.gov/citizensguide.pdf - page 19).

The history of our town belongs to the citizens that live in it. Let's change the perception of secrecy and mistrust that now exists about our city officials and have an open, honest dialog where we all can celebrate Rocklin's incredible history.

5. Request for information about previous artifacts excavated.

While we have no reason to believe the artifacts that were excavated from Clover Valley are not in good hands, we believe it is important to know:

- 1. Where are the artifacts located
- 2. What is planned for these artifacts
- 3. Can we view these artifacts, personally or thru photographs
- What were the results of the radiometric dating from the 'large mammal bone' with 'a series of slate projectiles points directly underlain' in site PA-98-119.
- 5. If these artifact were stolen:
- a. When were they stolen (date)?
- b. Where were they stolen from (city, state, address)?
- Was there a police report? If so, what city/county was the police report made? If no police report was made, why was there no report of the crime?
- d. Exactly what artifacts were stolen?

Clover Valley Lakes Development NOP Comments The O'Deegan Family 3210 Midas Ave. Rocklin, Ca 95677 6. We would request that the artifacts uncovered in Clover Valley would be given to the UAIC.

ida S. Pace 2**03 Tilla Serena Circle** Roddin, Califordia 95763

October 4, 2005

David Mohlenbrok Community Development Dept. 3070 Rocklin Road Rocklin, CA 95677

Reference: Clover Valley

Dear Mr. Mohlenbrok:

A few years ago I came here to Rocklin and I thought, "At last a dream of many years realized." There were many little critters and birds and no pollution with very little traffic.

It was not to last---developers came on all sides of Villa Serena and no more serena.

Now I have, out of necessity, acquired air filters for all rooms, and they run almost constantly. I've even needed to get an inhaler for a mild asthma.

We do NOT need more development of land and certainly no more highways cutting through the heart of Rocklin!

Rocklin needs more vegetation to purify our air, not more pollution which will surely be the case with more development.

PLEASE SAVE CLOVER VALLEY!

IDA S. PACE

Email: isew4zip@earthlink.net

October 11, 2005

Sherri Abbas Planning Dept. 3970 Rocklin Road Rocklin, CA 95677 OCT 1 3 2005

Dear Ms. Abbas:

We have visited Clover Valley and were stunned at its pristine beauty. As Rocklin residents who have seen development XXX in our area explode, we urge the Planning Dept. to set aside Clover Valley as a permanent nature preserve. Only this classification will make sure its beauty will be safe forever and that the immense variety of wildlife will be XX safe from development or or from parceling it up little by little until itsbeauty is compromised.

WE NEED CLOVER VALLEY! CLOVER VALLEY NEEDS US!

Sincerely,

C.A. Parker & Samily

The C.A. Parker Family

3685 Mountain View Drive Rocklin, CA 95677

ghperbet

From:

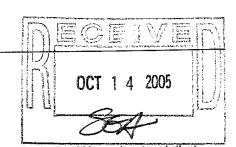
"George and Hanny" <ghperbet@starstream.net>
"George and Hanny" <ghperbet@starstream.net>

To: Sent:

Wednesday, October 12, 2005 11:26 PM

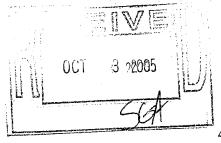
Subject:

Attn. Sheri Abbas ie Clover Valley www.ci.rocklin.ca.us



We hope that your scoping meeting was a success and that you received alot of input. We understand that the plans for Clover Valley have been revised and that fewer houses are being considered. We believe that is a good start toward making changes and would recommend that the entire plan be reviewed again to take in consideration the historical value of the land which is of much greater importance then the houses that could be built somewhere else. The thruway from Sierra College to Park would become another Highway 65 through Clover Valley as well as developments off of Park. Let's preserve Clover Valley Open Space and provide walking paths for the public to visit the historical sights and enjoy the flora and fauna. SAVE CLOVER VALLEY FOR ALL THE RESIDENTS OF ROCKLIN TO ENJOY NOW AND IN THE FUTURE.

Hanny and George Perbetsky 2720 Tahoe Vista Court Rocklin, Ca. 95765



4000 Silver Star Ct. Rocklin, CA 95765 September 30, 2005

City of Rocklin Planning Department 3970 Rocklin Road Rocklin, CA 95677

Subject: Clover Valley NOP/EIR Scoping Meeting

Since I will be unable to attend the NOP/EIR meeting on October 5th, I am writing to voice my concern about the Clover Valley project. Due to the nature of Clover Valley, and its historic and environmental value, the builder must be forced to meet the letter of the law, if and when, this project goes forward. Again, due to the uniqueness of the Clover Valley, I really think it would be much more value to Rocklin, it's citizens, and the Sacramento area, if it was preserved.

Some of my concerns:

- 1. The Native American sacred sites MUST be protected. By this I don't mean paved over or otherwise disturbed. A qualified archeologist or Native American anthropologist, preferably not hired by the developer, must be on site to monitor all digging and earth moving. The project must be stopped if any bones or artifacts are unearthed. There is too much valuable Native American history and artifacts in the valley to be damaged or destroyed. Clover Valley would make a great place for a Native American museum or cultural site.
- 2. The Valley is home to many types of wildlife, beaver, otter, coyotes, deer, wild turkeys, and several types of raptors, and any building will destroy their habitat. The citizens of the area will lose a unique area to go to learn from and enjoy this natural environment.
- 3. The proposed Clover Valley Parkway, running from Sierra College Road to Park Drive through clover Valley, will cause a tremendous increase in traffic in the area of Springfield, an active adult community, and will cause the residents a considerable amount of problems. The increased traffic on Park, will adversely affect the traffic and safety of the students at the Junior High and Rocklin High School. The traffic in this area will be greatly increased, as it will provide a short cut between I80 and Hwy65. As various other housing developments in the area are completed, traffic will also be adversely affected.

- 4. The stream and wetlands are a valuable resource, and must be protected at all costs.
- 5. The beautiful Oaks must be protected. Cutting down and replacing these great trees with garden type ornamental trees is not a reasonable trade-off.

In closing, I would like to say that Rocklin has a valuable Valley that should be protected from over development. It is a unique piece of real estate and should not be destroyed.

Don Perera

Member: Save Clover Valley Foundation

To: David Mohlenbrok
City of Rocklin
Community Development Department

Received 10/5 Dand Mother

Subject: Concerns Regarding Clover Valley Development

We would like to express our concern over the possible development of Clover Valley.

Our prime concern of this project is the perceived need to place a new sewer line down Rawhide, Midas, and Argonaut Roads. The wastewater could just as easily be pumped up to the existing line on Park Drive. It would be the least intrusive option to handle this problem. We see no good reason to disrupt the lives of all the residents living on and using those streets for six to twelve months. This estimate is based on the length of previous street projects within the city.

Our second concern is the increased runoff into Clover Valley Creek. We live on the creek on Rawhide Road and have seen the effect of heavy rains in the past, and the problems it causes to families living downstream. To add to this runoff is a disaster in the making. Detention ponds won't be enough. We are also very concerned about the rest of the problems addressed in part J in the Notice of Preparation letter dated September 12, 2005.

Another item of concern is the connection into Rawhide Road. As you are aware, Midas Ave. is already above capacity so there is no logical reason to make this connection. And to say that it would be used only for emergency vehicles is also illogical since those services would be coming from the other side of town. Our fear is that once this connection is made, and Park Drive, becomes impacted, that Clover Valley residents will use Rawhide Road. This doesn't include the problems created by thousands of construction vehicles that will be using this shortcut for years to come.

Last but certainly not least is the destruction and loss of thousands of years of Early American culture, and the loss of habitat for the numerous wild animals that call Clover Valley their home. One of the things that is unique about living along the creek in the valley is watching the deer, the turkeys, and other animals that wander along the creek. This would all be destroyed.

We feel that this area could be a great resource for schools and individuals to learn about nature and Native American history. We also feel that the City of Rocklin should work with local Native Americans to develop a plan to possibly turn this into a regional park that people from other regions would travel to. It could be a tourist destination that would generate local business revenue.

The City of Rocklin has a great opportunity to preserve this important site for generations to come. Please don't let it pass.

Thank You

Daniel M. Perry 3955 Rawhide Road Rocklin CA. 95677 Carole D. Perry

arole D. te

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

OCT 1 2 2005

COMMENT FORM

To be added/corrected on our mailing list and to document the author of comment received, please provide the following information. Thank you.
Name: Vladimir Plevanck
Address: 4040 Gilver Star Court
Organization: Rochlu 95765
Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.
Fam only a citizen (American).
Who is homeowher in senior Community
Your traffic goes right by my
house - I am worvied for my
safety. Why don't you find way
to make part for child good
all of us. This Clover Valley
project is wrong - Time to
Think New Ways for Clover Valla
What about pollution of air ????
(Prior to mailing this form, please fold form so that address on back is clearly visible, and attach necessary postage)
Why not think of all citizens all
why not think of all citizens not just rich people who build big

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

COMMENT FORM

OCT 1 4 2005

Statement was and the statement of the s
To be added/corrected on our mailing list and to document the author of comments eceived, please provide the following information. Thank you.
Name: Joanne Price Address: 5709 Ambassador Dr Rocklin, (A9567)
Address: 5709 Ambassador Dr Rocklin, (A9567)
Organization: Realton
Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.
Traffic on 80 is already a nightman
Traffic on 80 is already a nightmare It cost a lot of money spent on gas Sitting in traffic.
65 and 80 buth congested.
· · · · · · · · · · · · · · · · · · ·

(Prior to mailing this form, please fold form so that address on back is clearly visible, and attach necessary postage)

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

COMMENT FORM

received, please provide the following information. Thank you.
Name: TIM RUNYON
Address: 1312 Crystal Hollow Ct Lincoln, CA 95643
Organization: RESIDENT
Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.
1 oppose Clover Valley for traffic reasons, 1055 of natural habitat, open space, 0 aks etc. When There should be, open space preserved for future generations and for the history of the indians that lived there.

(Prior to mailing this form, please fold form so that address on back is clearly visible, and attach necessary postage)

David Mohlenbrok City of Rocklin Community Development Department 3970 Rocklin Road Rocklin, CA 95677

Re: NOP Clover Valley, Dated: 12-Sep-2005

3 pages total.

Mr. Mohlenbrok,

This letter is my response to the NOP Clover Valley Recirculated EIR dated 12-Sep-2005.



Light Pollution: The ability to see the night sky features is continuing to diminish as more development creeps into this area. Limiting the use of street lighting and vertical lights such as tree illumination should be required. Bright lights on hillside homes should not be allowed.

Transportation and Circulation:

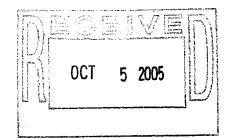
Traffic models should include disruptions in traffic flows caused by non-stop street improvements and repairs due to high rates of development. The models must assume that major roads will be in various states of repair due to high traffic volumes and heavy construction traffic.

Traffic models should also take into consideration the flow of interstate and highway traffic as this condition is worsening and interstate and highway traffic is now flowing onto surface streets because these roads are over-crowded. I'm certain that people traveling from Loomis and Penryn to the Galleria Mall at certain times of the day will find it much easier to short cut through Clover Valley thus causing more surface street girdlock.

Disruption is traffic flow due to high volumes of construction vehicles.

Personal vehicle windshield breakage and paint chipping due to rocks and gravel being thrown into vehicles from construction vehicles. This alone last year cost me over \$400 in new windshields and a trip to the court house to clear a fix it ticket for the windshield. The value of my car has declined due to excessive paint damage.

Air Quality



Adverse impacts to air quality due to landscape maintenance equipment exhaust.

Adverse impacts to air quality from outdoor fires and barbeques.

Take into account inversion layer issues with pollutants staying in the valley and not being able to escape, especially in the winter on foggy days.

Biological Resources

Pollution of Clover Valley Creek from additional pesticide, fertilizer and automotive waste run off. Killing or injuring fish and aquatic animals in down stream ponds and the creek itself. Numerous kids fish and play in the creek at Clover Valley Park.

Hydrology and Water Quality

Flood control system maintenance requirements and estimated maintenance costs

Cumulative Impacts:

Services: The area is already excessively strained in terms of providing services to its current population. Doctors, lawyers, counselors, schools are extremely stressed. It's very difficult to get appointments with the best service providers and children are always attending new schools that have just been built with marginally trained instructors. My daughter could not get into an advanced Algebra class at Whitney High due to lack of resources caused by excessive growth rates. This will impact her ability to excel in Math and may impact her ability to gain access to certain colleges. She was qualified to attend but there was no room due to over crowding and lack of teachers. Continuing to develop every inch of land as quickly as possible will only continue to exacerbate this problem.

Traffic: The area is suffering from huge traffic problems. At some times of the day you just cannot travel from Rocklin towards Sacramento on I-80 or Hwy-65. I can't wait until this Christmas shopping season as the last one was a nightmare. Cars are overflowing and flooding onto surface streets making them more dangerous and causing higher local street maintenance costs. Sure, we can just widen roads but these also cause huge traffic disruptions just as the Douglas Blvd over crossing project is currently causing on I-80. The developers of this project told me the Sierra College over crossing is going to be redone as Sierra College is fast becoming a major expressway. That should be a nightmare traffic situation. This project will greatly increase Sierra College traffic. All these development projects have this sort of domino effect on local resources.

Crime: The Rocklin police department reports that crime is up and the main cause is accessibility to Rocklin from major highways. The road into the back of Rocklin from Sierra College will give the criminal element another quick access point to our community.

Water: I can't believe there is enough water for all this development. We are really lucky there has not been a drought. I'm just waiting for the day when PCWA sends me a letter telling me I can't water my landscaping because there is not enough water. You and I both know this day is coming and it is the roll of government to protect these public resources. I just spent \$30,000 to re-landscape my home and need water to keep the plants alive.

Increases in crime and traffic will drive up insurance rates continuing the escalation in this area's cost of living. Housing construction costs have skyrocketed in this area due to shortages in construction materials caused by the huge amount of development. My home owner insurance rates alone have increased \$300 per year and I had to increase my deductible from \$2000 to \$5000 to keep up with these escalating costs. If I hadn't increased my deductible my rates would have doubled.

All of these things and more are contributing to a decline in the quality of life for Rocklin residents. Rocklin needs to protect its residents by controlling the rate of growth. If the Rocklin City Council does not start looking at these issues then Rocklin residents will start to vote with their feet (move out of town). I, for one, am almost fed up with the development rate in this area. My kids have all been displaced and tossed around from school to school. Major traffic problems are just getting worse and insurance and crime rates continue to increase. As more of the long time Rocklin residents leave this area, more transient people will move in and the problems will get worse, not better.

Clover Valley is an excellent place to start turning this situation around. There is no need to develop this land now. There is plenty of land in Rocklin that is more suitable for development. Let the clover valley land sit for a while why we try to understand the complex issues of this pristine valley. Let Rocklin residents explore its native beauty and help to decide the fate of this pristine valley. Maybe build the hiking and biking trail first so that residents can explore the valley and see for themselves.

Regards,

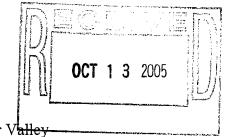
John Schimandle

4100 Clover Valley Rd.

Rocklin CA 95677

Susan Somers 5315 Thunder Ridge Cr Rocklin, CA 95765 October 13, 2005

David Mohlenbrok Senior Planner City of Rocklin, Community Development Dept. 3970 Rocklin Road Rocklin, CA 95677



Comments on the Notice of Preparation for Clover Valley

As a resident of Rocklin, since 1997, there has been so much development both in housing and retail .Rocklin is still growing, but we have an opportunity to preserve this wonderful Clover Valley. The problem that I have with developing Clover Valley is that it will increase the already bad traffic, add to the already bad air quality, and all but eliminate the living space for numerous animals and bird life. Many of our residents do not know what this Valley is an integral part of the ecosystem. My concerns are many and I hope that you will include my suggestions in the EIR.

Valley View Parkway

This roadway does not add to the quality of life in Rocklin. It is a road that will add to the light pollution, air pollution and noise pollution. The road should not be going over Clover Valley Creek. This will impact the Dry Creek Watershed which is already precarious due to the urban nature of the area. I suggest that quiet road surfaces be used along with low lighting. Reroute the road around Clover Valley and not over the creek. Does Rocklin want to provide roads for others to use as a short cut through our city? Provide ingress and egresses just to satisfy the residents with the least amount of impact to this natural valley.

Open Space

Ensure that the open space designated in the plan stays natural. Do not landscape or develop into a park. Have natural trials, not paved within the open space. Commit to keeping open space in perpetuity, not just a holding pattern for future use. Have continuing open space not islands unto themselves.

Clover Valley Creek

The creek is part of the Dry Creek Watershed. Provide ongoing funding, possibly through an annuity, for creek monitoring quarterly and first flush (first rain) on a continuing basis to monitor the impacts from development.

Setbacks from the creek should be flood plain plus 100 feet to have low impact on the watershed.





Dear Sir

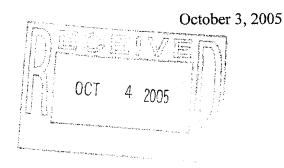
10 2 05

Downled unge you to work against developing cli Valley. Polution traffic would be bad of my greatest encern would be so much water use.

I am very much against Cenver Valley Deanne Tomasle

3825 Clover Valley Road Rocklin, California 95677

Mr. David Mohlenbrok City of Rocklin Community Development Department 3970 Rocklin Road Rocklin, CA 95677



RE: Notice of Preparation Clover Valley Recirculated Environmental Impact Report, September 12, 2005

Dear Mr. Mohlenbrok:

Thank you for the opportunity to provide comments for consideration in preparation of the revised Clover Valley EIR. Our questions and comments on the revised Clover Valley project (referred to hereafter as the "project") follow.

The reduction of the number of properties to 554 in the project is commendable. We recognize the difficult position the city is in respect to developer rights.

Certainly, if the individual project lots were comparable in character and size with many of those now on Rawhide and Clover Valley, with 250 or fewer properties on the newly planned project acreage, I believe development would be greeted with minimal contention. Were 250 or fewer properties planned, the City of Rocklin, in all likelihood, would receive relatively few EIR comments excepting those relating to the cultural issues. A further reduction in project lots deserves careful consideration by the City and Developer given the community resistance that the Clover Valley project has thus far encountered.

However, at the new level of 554 lots we believe that the project plan is still flawed because it changes the character of Clover Valley, is destructive to the valley, and clearly fails to satisfactorily address and resolve major systemic traffic problems and other issues of importance to many Rocklin residents. As a result we submit the following concerns which we believe should be addressed in the EIR and resolved by the City and Developer before approval of the project.

Foremost of our concerns is traffic and congestion. The overall plan to mitigate increased traffic from the revised Clover Valley project, when considered together with the planned developments in Lincoln and Loomis and the expansion of the Thunder Valley Casino facilities is inadequate. Without a better plan, more railroad overpasses and the doubling of lanes on Sierra College Road, traffic on all streets in the north of

Rocklin and in and around, Midas, Park, Rawhide and Sierra College and Clover Valley Road will all be seriously overburdened. Specifically, the cumulative traffic impact from all these increases on Sierra College Drive, Taylor and Pacific, Highway 65, Pleasant Grove, Midas, Clover Valley and Rawhide needs to be addressed. We have seen no evidence that these cumulative traffic increases have been adequately addressed. Infrastructure improvements for traffic, schools, emergency vehicles, and for access to I-80 are all significant problems in the current project plan. We suggest that the EIR address these impacts over a multi year time frame.

Project new residents will have drive on Park to schools, work, and businesses. The city should expect the project residents to demand full access through the planned Rawhide restricted access gate. Now Midas, Clover Valley and Rawhide do not have stoplights. We strongly feel that the city should continue to avoid having stoplights on these streets in the future. We feel the Rawhide limited access traffic gate is a significant expected future problem that needs to be addressed in the EIR since full access through Rawhide will overload Midas and create the need for stoplights.

Because no alternate accesses and schools are planned in the project we believe that the two-lane road now projected as Park Drive, will be inadequate from the start. Take a look at Midas and other Rocklin streets when school is in session and see the school buses and lines of cars at the stops in front of these schools. Clearly the project will result in more traffic and more traffic congestion. At least one additional access to the project from Park Drive, from the 12 Bridges development or the north of Sierra College would serve to relieve traffic flows in and out of the project. These additional project accesses need to be considered in the EIR now, rather than after the project is approved.

To reduce the noise, disruption and traffic on Clover Valley and Rawhide during project development, we believe that the Park Drive extension through the project needs to be completed before project development begins. Park Drive should provide access during construction. The Clover Valley Partner representative made assurances at the recent Clover Valley Partners morning presentation that this will be the case, Park will provide access. However, we have heard from residents attending the evening presentation that the Clover Valley Partner representative said that Park would not provide construction access and that Rawhide would be used. The City of Rocklin either in the EIR or by separate correspondence needs to confirm that Rawhide and Clover Valley Road will not be used during construction of the project.

We submit that South Placer County residents and others driving on I-80 recognize that traffic congestion from Newcastle through Sacramento is a continually growing problem! We do not see that this is adequately considered in the new plan for the Clover Valley project, nor has there been any attempt to assess the cumulative effect of the major growth projected for South Placer County, Sacramento and surrounding areas. The ever-increasing traffic on I-80 cries for sound planning, now, before the project adds to the growing glut on our highways and streets! The EIR needs to address and look at the continuing crowding on Rocklin's main interstate access.

In this regard, consideration as to the impact of I-80 must be given to the project's impact, in combination with all the other South Placer county developments. Given the current Sacramento development near the I-5 and I-80 intersection we submit that I-80 will, before anything is done to relieve the situation, become one long traffic snarl and parking lot from Newcastle through Rocklin, Roseville, Sacramento and West Sac.

The approval and build out of the multiplicity of new bedroom communities and senior citizen housing projects in South Placer County as far as we have noted has ignored the need for an alternate route to I-80 through, into and out of Sacramento. No one can question the need for an alternative, freeway standard, route around or through the rapid growth communities of Rocklin, Roseville, Loomis, and Lincoln connecting with I-5, Natomas and I-80 and the Sacramento International Airport. We believe this issue should be addressed before the project is approved and request that it be considered in the EIR.

Riego Road is now a heavily used alternate route between South Placer County and the Sacramento metro area. It is your basic two lanes, heavy access, no shoulder, and farm access road. It is woefully inadequate and with the heavy level of daily high speed commuter traffic is unsafe. If Riego Road has to function as a major traffic artery for Lincoln, Rocklin and Roseville residents it needs to be dramatically improved now before approval of the project. The EIR needs to fully address alternate routes, including Riego Road, to the west and metro area from Rocklin and the project.

As part of the EIR traffic planning should be completed jointly with the California Department of Transportation and representatives from the counties and locales, which will be impacted, by the continued population growth and traffic in the I-80 corridor that includes Rocklin. In addition to surface vehicle traffic considerations, such planning should address improved busing, train and light rail service from South Placer County to the Sacramento metro area.

Continuing to endorse and approve at the city level new developments in South Placer County, such as the project, without major consideration of the larger area traffic implications is short sighted and fails the residents of Rocklin and other areas. While such planning may be looked at as an area problem we believe it will be a problem that will seriously impact the residents of Rocklin in the future.

Many joggers, walkers and bicyclers frequent Clover Valley and Rocklin Road daily. In spite the absence of sidewalks in much of Rawhide and Clover Valley Road, these streets are safe for the current levels of vehicle, pedestrian and other traffic on them. Your EIR and the project need to preserve these conditions for all the residents who use these streets and who will use the new streets in the project. Clearly, to preserve the character of Clover Valley for pedestrian traffic access to the project from Rawhide and Clover Valley Road needs to strictly limited to emergency vehicles. We have been informed before this is the plan. These restrictions need to be retained in the plan and EIR in the future regardless of the number of new homes in the project.

In this regard, are new walking, hiking and, or bicycling access trails planned in the project? If they are not they need to be included in the EIR so that all Rocklin residents can further benefit from the further development of Clover Valley.

The new EIR needs to address the protection of cultural resources before, during and after project construction. The city and developer need to adequately protect the new cultural sites that may be uncovered during development?

Will the project impact the supply, quality and cost of our water? What about Clover Valley Creek, will it accommodate drainage from the project?

Wildlife currently abounds in Clover Valley. Will the wild turkey, deer and other animals continue to have a habitat during and after completion of the project?

Are special assessments planned for the infrastructure improvements necessary to develop the project?

Thank you for the opportunity to respond to Notice of Preparation for the EIR. We look forward to the results of the EIR and remain optimistic that the many difficulties inherent in this project can be satisfactorily resolved.

Sincerely,

Leon Tuttle Roberta Tuttle

Cc: Tom Miller

Placer County Development Resource Agency

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

COMMENT FORM

OCT 1 4 2005

To be added/corrected on our mailing list and to document the author of comments received, please provide the following information. Thank you.
Name: Michie Vallieres
Address: 670 Old Cirase Valley Rd Colfax CA 95713
Organization: Greenfre Org.
Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.
The impact our woodland environment
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(Prior to mailing this form, please fold form so that address on back is clearly visible, and attach necessary postage)

David Mohlenbrok

From:

John R. Voris [sunkat@jps.net]

Sent:

Friday, October 14, 2005 4:15 PM

To:

David Mohlenbrok

Subject: Clover Valley Project- Environmental Impact Report Scoping Meeting: Comment Form

Clover Valley Project

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

COMMENT FORM

To be added/corrected on our mailing list and to document the author of comments received, please provide the following information. Thank you.

Name: John R. Voris & Janet Voris	
Address: P.O. Box 1241 Lincoln, CA 95648	
Organization: Homeowner in Placer County & students of Sierra College	

Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.

As Placer county residents and taxpayers, who live 3 miles N.E. of the Northern terminus of **Sierra College Blvd.** we were concerned about the impacts of putting residential developments in Clover Valley. After attending the EIR Scoping meeting we are greatly concerned about our future.

Regarding Hydrology and Water Quality: The present proposals appear to be more concerned with flooding and visual pollutions (plant litter and oil) and ignore the real danger of toxic run-off from residential uses, ie: chemical use, pesticides, cleaners, etc into the creek. What is going to be done to prevent pollution during the residential construction phase? A lot of construction workers feel that burying a problem solves the problem. It also appears that a lot of the proposed homes are going to be right next to the creek. Homes within 40 or so feet of the creek are going to impact it more than a simple linear component to the average distance of homes from the creek. Will restrictions be placed on the homeowners regarding pesticide and herbicide use which will surely seep down into the nearby creek? How will the safety of the fish and other species that dwell naturally in the creek be protected?

Regarding Transportation and Circulation: Studies of traffic flow, etc. are all good and well, but placing a stoplight near the blind corner on Sierra College Blvd at the top of the ridge is asking for auto accidents. Changing Sierra College to a 4 lane road may help some, but will also attract more drivers looking for a quicker route. There is already a huge problem with roadkill on Sierra College Blvd as the animals look for an escape route away from human

population. Where will these animals go if Clover Valley is taken over by human residents? Do people have more right to live there than the animals, which have always called Clover Valley their home?

Regarding Air Quality: We didn't find any reference to air quality, which is strange, because the Loomis basin traps a considerable amount of polluted air on the East and South sides of Clover Valley, and air inversions can spill dirty air into the valley from the West side. This is without development. Increased cars driving through the valley will greatly intensify the pollution in the air. One additional problem will be people using their fireplaces in the winter. The valley is closed on four sides and smoke will collect in the winter. I have driven through the little valley in Rocklin between the Whitney golf course and the West ridge of Clover valley in the winter and the smoke just hangs in the air. It will get nasty in Clover Valley. Are you going to prohibit the use of fireplaces in Clover Valley?

We are very concerned about the impacts of developing Clover Valley, and don't feel that all angles have been thoroughly checked into. We would ask that the City of Rocklin please reconsider any future development of this site, if for nothing more than to preserve the ancient Native American artifacts that have been discovered there. A protected city park with an interpretive center preserving the heritage of the Indians would be a great alternative which would be educational for people of all ages.

Please save Clover Valley from destruction and development!

John & Janet Voris Concerned Citizens

Save or Destroy Clover Valley

By Ken Votaw - resident of Rocklin

Is an undisturbed natural valley of wildlife, extensive wetlands, oak trees, granite outcroppings, numerous historic sites of Native Americans, prehistoric sites and a year round bottom running creek with riparian growth banks worth saving? The City of Rocklin has that choice. Will the City Council vote to destroy Clover Valley or will they vote to save Clover Valley?

If the owners and builder developers of the Clover Valley prevail and have their way then a few people will make a lot of money. The rest of the inhabitants of Rocklin will pay in many ways. The air will become fouler with added pollution and the noise will increase many fold from the added traffic and will immediately become a major nuisance to Rocklin citizens. A vote for developing the Clover Valley is a vote for total suburban sprawl. Infill of most of Rocklin is already planned and being built now.

The development of Clover Valley with over 46 acres of roads crisscrossing its valley and connecting northeast Rocklin directly to Sierra College Blvd. will open a major thoroughfare to the sprawl of Bickford Ranch Development, Twelve Bridges Development and a proposed development on the ridge top running south from Clover Valley, and act as an example for further sprawling and eliminating the foothills of the Sierra Nevada ever eastward.

The beautiful views of the Clover Valley with its ridges of oak trees will be replaced by houses, buildings, roads, and traffic with more unending noise. Clover Valley as the only large open space remaining in Rocklin would be destroyed through segmentation and grading and overbuilding. Larger wildlife like coyotes and beavers will disappear from the valley and people will necessarily pollute the land and water with garden chemicals and automotive pollutants and other human waste and trash.

On the other hand by voting to save the Clover Valley the quality of life will improve immensely. Property values will greatly increase to their true value where life is more livable and healthier and sustainable for people and wildlife. Currently Clover Valley is a natural valley teeming with wildlife and nature. It is part of the wildness of the Sierra Nevada; it serves birds in migrations and is self sustainable with natural water and flood control. It is a buffer from surrounding traffic and traffic noise and insulates east Rocklin into a valley of peace. Walking or bicycling on Park DR above the valley offers opportunities of communing with nature and stunning views of the nature of Clover Valley and the eastward living Sierra Nevada.

Clover Valley Project

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

10/11/05	COMMENT	FORM

To be added/corrected on our mailing list and to document the author of comments received, please provide the following information. Thank you.

Name: Kenneth And Norma VULLICT
Address: 3835 Clover Valley Rd. Rocklin, CA.
Organization: home owner
Please provide us with your written comments on the scope of the EIR by 5:00 pm,
October 14, 2005. Dear Sir
We believe that Clover Valley development should
on time the housing let sie established by
existing lot sie along, Clones Valley Rd and Raubisle Rd.
These Plat since wantly then he from one-half ache
density to 5 cerse ilensielle
these late would then replect an usuard scale of housing
up and juto the valley rather than a love scale
of housing as currently designed.
I Few landareas now exist for unward scale pouring
asa single development as the claver Valley development
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for average to small scale but development.
take this once and only opportunity for a true upreale
housing project while we can.
We are strongly opposed to oppying Rawhide R and Ospeciall
Clover Valley REto through traffic traffic from this project
will love our ability to get in + out of aur dringing safely.
(Prior to mailing this form, please fold form so that address on back is clearly visible,
and attach necessary postage)
REGELVE MINISTER

SEP 2 3 2005

Sept. 22, 2005

City of Rocklin 3970 Rocklin Rd., Rocklin, CA 95677-5000

Attn: David Mohlenbrok

Dear Mr. Mohlenbrok:

I support some development of the Clover Valley Area.

Harlen Walters

Additional development of some houses, some commercial and some park lands will greatly benefit the City of Rocklin. Development will add increased revenue to the City treasury and bring increased trade to our area.

With the widening of Sierra College, the traffic pattern should not be an issue. It makes a lot of sense to funnel homeowners down Sierra College to Freeway 80 for shopping and for employment access. No development appears to be an archaic approach as we are a growing area and located very close to Freeway 80 and hence access both to the City of Sacramento and to the Sierra Nevada mountains.

I feel strongly that both large and small lot development should be considered along with some commercial development. Also, it is imperative that large park areas are incorporated into the overall plan for Clover Valley.

Sincerely,

Charlene Walters 3040 Sunset Hill Rd.,

Rocklin, CA 95677

Clover Valley Project

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

COMMENT FORM

OCT 1 4 200!

To be added/corrected on our mailing list and to document the author of comments received, please provide the following information. Thank you.

Name: Sarah word

Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.

Address: 5240 rocklin rd #108 Rocklin CA 956

Organization: Resident

1 oppose this because (1055 of habitat will occur. 1055 of beautiful seenery. Traffic will pollute the area. Animals will suffer.

(Prior to mailing this form, please fold form so that address on back is clearly visible, and attach necessary postage)

Clover Valley Project

ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

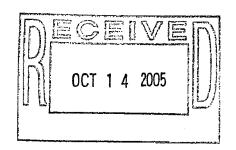
COMMENT FORM 2005 OCT 1 4 To be added/corrected on our mailing list and to document the author of comments received, please provide the following information. Thank you. Address: Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.

(Prior to mailing this form, please fold form so that address on back is clearly visible, and attach necessary postage)

WHELAN AND GROVER FAMILIES 3416 AND 3413 WOOD GLEN CT. ROCKLIN, CA 95677

October 13, 2005

Mr. David Mohlenbrok City of Rocklin Community Development Department 3970 Rocklin Road Rocklin, CA 95677



Re: Notice of Preparation Clover Valley Lakes

Dear Mr. Mohlenbrok:

The City of Rocklin has requested public comment regarding a proposed scope for an Environmental Impact Report (EIR) on the project previously known as Clover Valley Lakes. It is my understanding that the primary emphasis behind the EIR is to provide a tool for public agencies to balance public objectives, and private interests. We are hopeful this new report will reflect this spirit, provide full disclosure, and allow for informed discussion.

1. Inappropriate to exclude prior comments and questions on project.

City has announced in the Notice of Preparation (NOP) that as a result of revisions to the EIR, all prior comments regarding to the original EIR's and the project will not be responded to, even though the underlying project recently presented to the public, is essentially the same. At great time and expense, the public has expressed solicited concerns, comments and questions to the City, regarding this project for years. A citizen even resorted to a Freedom Of Information Act (FOIA) request to an outside agency to obtain documents which responded to unanswered questions. Is this the intent of CEQA? It would be remiss to ignore the history of this project, difficulties encountered along the way and how, those issues have been corrected or changed, if addressed at all. This is especially relevant since many, if not all, of those comments and questions solicited by the City may still be relevant to the new EIR. To predispose that prior questions are not germane and will only be "considered", serves only to short circuit the process, not to insure full disclosure to the public. The City's position in the Notice of Preparation (NOP) would seem poorly conceived anyway since aren't you simply inviting citizens to attach all prior correspondence to any response? This would be a foolish exercise. CEQA is not meant to be used as a vehicle to limit disclosure.

2. Public should be fully informed regarding the 2/4 lane "Parkway".

Months ago it was announced in the newspaper by city officials, and addressed in the NOP, that the proposed parkway through Clover Valley, renamed Valley View Parkway, would be reduced from 4 lanes to 2. However, the developer representatives have disclosed at a recent neighborhood meeting that the City has required road grading for the "Parkway" to accommodate 4 lanes. Further, sewer lines must now be oversized to service not only the deficiencies of the subject property, but development plans beyond Clover Valley. If it is possible the subject project is predisposed to support other development, or existing development, the potential, if not certain impact of a 4 lane road (and any other impacts) necessitates review.

Residents should also have disclosure regarding the proposed speed limit and any safety issues relating to the "Parkway". The "Parkway" is a steeply graded straight road which may entice high speed travel, unfortunately adjacent to a residential area. What is the safety record of similarly graded high speed 2 and 4 lane roads in Rocklin, and in the area? How many traffic accidents, speeding issues? Have there been any injuries to pedestrians, bikers, runners etc.? What is the risk to the public, and is this an acceptable cost for the benefit?

3. Clarification of land use designated as "open space"

The NOP represents a large volume of "open space" at this proposed project. However, a quick review of the map reflects that outside of wetlands, extremely steep hillsides, Indian artifact sites and developed roads, usable open space totals approximately 5 acres (out of 622 acres, less than 1/10% of the project). The EIR should have a clear disclosure and clarification regarding land termed "open space". Land that cannot be developed as a result of environmental, topographical, or archeological reasons should be distinguished from otherwise usable "open space" land set aside by the developer to enhance the aesthetic beauty and provide for public enjoyment or recreation. If only 1/10% of the total land area is set aside as open space, let the EIR disclose this to the public.

4. Open and clear disclosure of proposed grading

In an effort to review the small plan provided with the NOP, the grading plan includes lowering the hills of Clover Valley 20 feet or more (which represents as much as 10-20% of their total elevation) in order to increase the flat area atop ridges to accommodate additional house lots. The NOP briefly discloses the grading specific to the Parkway and mentions 1.6 million cubic yards of grading, already 200,000 yards greater than prior disclosures, along with major stockpiles. Substantially more detail should be openly and clearly provided to enable an understanding of the proposed grading. In the event this is a major cut and fill operation or otherwise, let this be disclosed in a clear and straight forward manner.

- 5. Tree removal analysis should include biological analysis, the total proposed loss and how the City's current Oak Tree Preservation Plan, and any amendments thereto specifically will minimize impacts. The number of Oak trees to be removed now totals 7,422, up from 1,800 in the original disclosure to the public. Estimates should extend to trees removed in order to build houses and how the City's Tree preservation plan (if applicable) will assist in this regard. Since estimates can vary greatly, variances should be identified rather than only specific estimated losses. Estimates should also include damage to other trees impacted through encroachment of their natural drip lines, changes in their water supply, receipt of runoff from housing areas. Analysis should include Cities experience with its preservation plan, how it is managed, and the net result. Various historical statistical analysis should support understanding the impacts of the plan, what percentage of citizens have elected to participate (and how many do not), resulting native plantings in developed areas, and other information. It would be helpful to understand the enforcement efforts to monitor the follow thru of the plan. It is impossible to understand and assess the tree removal estimates and proposed preservation without biological analysis, current or proposed city ordinances, knowledge and an understanding of the City's specific experiences, and resources allocated to this process.
- 6. Report should disclose and explain the aesthetic "standard" that will be used to judge and/or draw conclusions regarding grading at project.

The City of Rocklin has a wide range of aesthetic "standards" on ridgeline projects. How and what "standard" does one apply? Overlooking Rawhide Road at the entrance to Clover Valley rests a project that apparently was an acceptable "standard" for ridgeline development. That can be contrasted with the project high on the ridgeline above Sierra College Blvd. south of Interstate 80. Another contrast is the 30 foot block walls erected to support houses above Clover Valley Woods. When dealing with the finest of properties with the highest of natural qualities, an appropriate level of aesthetic "standards" should apply. In a City where the aesthetic impacts vary greatly makes discussion of such a "standard" confused. Report should clearly discuss what the acceptable "standard" is, and basis used to discuss aesthetics for this project.

7. Culverts used in Clover Valley Creek? What are the impacts outside of visual issues?

There are many thoughts which come to mind regarding this statement on page 6 of the NOP. What are the impacts on the Creek during construction, impacts on fish and wildlife? Culverts constructed further downstream from the proposed project have clearly altered the flow of the creek and created a holding place for silt. Common sense would tell us this would be a highly susceptible place for clogging and create potential flooding in the valley during wet winters.

8. Measurements of Project Density and Clustered Housing

Prior analysis and reports, including the prior EIR, on this project have included inequitable comparative data regarding density at the proposed project. Project marketing has included equitable comparisons between housing lots typically ¼ acre in size, to existing Clover Valley development with 1 acre lots. All numerical analysis of this project should be objectively performed, and consistently applied to permit full disclosure to the public.

9. On May 23, 2001, a letter was provided to the City of Rocklin, at their request, regarding concerns with the proposed development. Five years later, and after an EIR was drafted, these issues have yet to be adequately addressed and remain applicable. Accordingly, this letter along with its issues and questions is attached and incorporated herein as part this response to the current request for public input regarding the NOP.

The issues discussed above by no means represent a result of exhaustive research and conclusive analysis of all matters of concern with the referenced project. We reserve the right to address additional concerns not limited to the subject matter discussed in this letter at a later date. Thank you for providing the NOP, and the opportunity to comment.

Sincerely,

The Whelan and Grover Families

CONCERNED CLOVER VALLEY RESIDENTS 3413 WOOD GLEN COURT ROCKLIN, CA 95677

May 23, 2001

Ms. Laura Webster City of Rocklin Community Development Department 3970 Rocklin Road Rocklin, CA 95677

Re:

Clover Valley Lakes Proposed Development

Dear Ms. Webster:

In accordance with a document received from the City of Rocklin dated April 25, 2001 titled Notice of Preparation, Draft Tiered Environmental Impact Report ("EIR") which requested feedback regarding the City's direction and management of the EIR enhancement on the referenced subdivision, the following comments are provided. Although the document appears to be drafted to various State and Federal government agencies, as homeowners and residents within Clover Valley who will be greatly affected by this project, consideration of our input is appreciated.

It is understood the re-review and expansion of some areas of the previous EIR, prepared six years ago, is partially based on the City's analysis and a public workshop held in December 2000. However, a greater level of review and/or redrafting is called for based on previous public input, the circumstances at hand, and growing discomfort with this project based on the disclosure of new information. Further, the subject EIR addresses only the "tip of the iceberg" regarding the impact and effects on Clover Valley and the surrounding residents. The goal of our City representatives should ultimately be the full disclosure and objective investigation of all negative aspects of this complete development as proposed.

1. EIR Should Consider Significantly Greater Tree Removal Than City's Current Analysis

The EIR should consider the removal of substantially greater number of trees than the 1,800 previously disclosed by the developer and greater than the number analyzed by the City in the April 25th subject document. The City disclosed that approximately 7,058 oak trees will be removed to construct this project (a 400% increase from developer's original representations). This comprises 25% of the trees in the applicable portion of Clover Valley. We believe the final number of trees removed will be far greater.

The City's analysis considers a 5,000 square foot per building envelope for the residences, garages, driveways, utility easements, and what is termed as "miscellaneous sloped grading" (which presumably means leveling or terracing the land to accommodate flat lots and slab foundations). Importantly, the analysis does not consider the overall grading process, buildings' encroachment on driplines, trenching, landscaping, effects of automatic irrigation systems, crushing of small surface roots, and the experience of the development of thousands of homes in the City of Rocklin which indicate that the long term survivability of any tree that is subjected to this intensity of development is minimal at best. A realistic analysis would consider clearing out virtually all native plants, trees and animals in the developed housing areas.

Throughout developed parts of Rocklin, there are few instances, outside of greenbelts or areas where owners have made specific accommodations, where native oak trees are thriving. Assuming this doubles the City's analysis including additional area for the roads, minor streets, and other improvements, at least 50% of the trees may be removed or permanently damaged.

The City's tree analysis also does not consider the cut and fill estimates provided by the project engineer as discussed in the subject document provided. Cut and fill estimates for residential areas total nearly 1.5 million cubic yards of dirt. For 800 lots, this is an average of 2,000 cubic yards per lot. Discounting 25% for minor streets, etc., this leaves average grading of 1,500 cubic yards per lot. Assuming the lots average 1/3 or 1,600 square yards, every square yard of the lots will receive an average of 1 cubic yard of grading (cut and fill). Clearly, this subdivision is a major cut and fill operation after which there will be nothing natural remaining within housing areas. The City's "5,000 square foot building envelope" (or 555 square yards) to determine ultimate tree removal is simply unsupported.

2. EIR Should Consider All Grading and Terracing Within The Subdivision, Not Just Limited To The Infrastructure Development

Grading and terracing within the subdivision should be expanded beyond the infrastructure to all areas where housing developments occur (especially considering the new information provided). The City recommends expansion of the EIR only regarding potential impacts on aesthetics, geological structure and formations, plants and wildlife, water runoff and water quality from the "construction of Clover Valley Parkway and grading required for other roadways and infrastructure" necessary for development. As experience has shown in the ridge above Clover Valley where a hilltop has been plateaued and the ridge built up to a level that many view as unsightly, a project off El Don/Foothills (Sierra Creeks II) where a 10 foot wall of dirt now resides next to existing residences and an entire hillside has been terraced, clearly shows that the roads and infrastructure is the least offensive development aspect of the project. In both instances as we recall, the City claimed either to not have prior knowledge or did not perform proper due diligence to have an understanding of the damage that was to be inflicted on the properties (and adjoining residences) until after the fact. Based on the large scale tract home development proposed, the City can avoid a similar situation. (Please also re-review the analysis in Item #1 which considers estimated grading cut and fill volume now being disclosed.)

3 EIR Should Include Extensive Analysis Into The Effects (And Need) Of A Sewer Line Through Existing Development

As residents, we were shocked with the disclosure that the roads we use, and the <u>only roads</u> available, will be disturbed to construct a 15 inch sewer line (which is larger than either of the two existing sewer lines) in order to accommodate 620 additional homes that the existing infrastructure cannot accommodate. This is a <u>major</u> impact on existing residents based on the length of the required line, the inconvenience, noise, and general disruption of many lives, not to mention the <u>temporary disruption of sewer service</u>. Unlike areas of the City where streets are gridded providing ingress/egress alternatives, in this narrow valley there are none. In the event sewer capacity can only handle 180 homes, then perhaps this is the density we should be discussing or find another route that does not greatly impact long-term residents. The potential that this volume of homes does not maximize development revenue on the land is immaterial. We suspect the developers are of sufficient experience to have conducted proper due diligence and had prior knowledge of these facts. The zoning densities are maximum allotments, not entitlements at the expense of the residents of Clover Valley and Rocklin. We trust the City of

Rocklin's Development Agreement considered this fact and made no further commitments in this regard.

4. EIR Should Consider That "Conservation Easements" Are Only Proposed

The EIR should consider that "conservation easements" are only proposed even after the approval of the large lot subdivision. The City has previously represented that "conservation easements" are only proposed and may be modified at a later date. A total of 800 homes may not be the final density. An additional 133 homes may be constructed after the development process has begun. Further, only the steepest hillsides, required flood plain area around Clover Valley Creek, and detention ponds to try to control downstream flooding as a result of the project, remain undeveloped in order to achieve the 800 home density. No natural areas that are even remotely level remain outside of the above. Unfortunately, this is to the detriment and without regard to existing homeowners and prior developments in Clover Valley. Some existing residents will have homes cut into steep hillsides above their homes in the interest of increasing density. This is most evident in the proposed Summit Drive area and the cul-de-sac above Wood Glen Court. It would appear that a more accurate representation of this development for the EIR analysis is that there are no set asides of land other than that mandated by flood issues and topography.

5. EIR Should Consider Endangered, Protected And Other Plant And Animal Species

We are unaware that the EIR from 1995 carefully considered all plant and animal species endangered, protected or otherwise, which reside in Clover Valley. Several residents are aware of the sightings of mature and juvenile eagles in the area believed to reside in the undeveloped portions of Clover Valley. It is believed this matter should be researched and remediated in accordance with State and Federal law.

6. EIR Should Consider Traffic Issues

We disagree with the City's view that traffic issues should not be re-analyzed. Development in South Placer has grown at such a pace that it has exceeded many projections from 1995. It is difficult to understand that the Bickford Ranch project (which was not approved in 1995), Twelve Bridges, Whitney Oaks, Stanford Ranch and Clover Valley Lakes were fully considered in a 1995 EIR as represented. We disagree with the City's analysis that the traffic study should not be redone, based on adequate previous analysis and a reduction from the original density. The 133 home reduction in the Clover Valley Lakes project represents 16% less density for the project. However, between the large developments (Bickford Ranch-2,500 homes, Twelve Bridges-4,500 homes, Whitney Oaks/Stanford Ranch-2,000 or more homes, Clover Valley Lakes-800 homes) at least 10,000 homes will use Sierra College Blvd. making the 133 house reduction representing only a 1% change. The impact of the change is insignificant, not the effects. Further, we are unaware of an analysis regarding the traffic noise which will reverberate up and down the narrow valley from the Clover Valley Parkway to be constructed.

The construction of a four-lane road as designed through Clover Valley is also somewhat puzzling. Other subdivisions in Rocklin of similar size are serviced by two-lane roads. It would appear that this is primarily an effort to accommodate commercial development in a portion of Clover Valley and to relieve a growing traffic problem in Stanford Ranch/Whitney Oaks; secondly, to service the subdivision.

Residents also have continued concern about what appears to be an option left open for ingress/egress on Rawhide Road. Through investigation, the residents understand that roads designated for the proposed use (emergency and school bus/postal) need only be 20 feet wide. Why would this road remain the width of all others unless its use was being left open as an ingress/egress option at a later date? Another access point also appears to be considered on the ridge where Summit Drive (proposed) is to be located. Is there another optional plan for this road to link with Argonaut Avenue and have those residents been advised?

From attendance at meetings and articles in the newspaper, it would appear that the town of Loomis intends to sue Rocklin over the traffic issue. Has this matter been resolved? Predatory business practices by our City are not understandable and not acceptable;

7. New EIR Is Warranted

Based on the City's own analysis, resident issues, misrepresentations, and numerous other concerns regarding this evolving and changing project, substantial evidence exists that a new EIR is warranted. Environmental impact is exponentially greater than that previously disclosed; drainage issues are greater, the traffic issue is not the same as studied in 1995, "conservation easements" appear nonexistent, etc. It is difficult to imagine a situation which reflects a greater need for a new EIR. The City would be following State law by obtaining a new report.

From a practical standpoint, it seems absurd to be discussing minimizing environmental impacts and preserving eagles, native trout, mountain lions, deer, turkeys, quail, oak trees, Clover Valley Creek, etc. when the discussion revolves around cutting a four-lane highway across a valley which is a couple hundred yards wide to try to remediate the current traffic problems from other subdivisions, removing between 7,000 and 15,000 oak trees, 1,000,000 cubic yards of grading, constructing miscellaneous roads, 800+ homes, commercial developments, on all but the steepest hillsides, creating a traffic and sewer mess for residents to deal with in addition to inescapable noise, smog, and fireplace smoke. In the end, this project as designed simply damages or destroys Clover Valley. Existing residents, who fully understand the property owner's right to develop, at least would like to minimize the encroachment and damage to their homes and neighborhood and develop the area in a responsible and creative fashion as what has been the history in Clover Valley.

It seems there are some obvious adjustments/creativity that could be placed into the design to reduce the environmental impact and effect on neighboring residents:

- Use a portion of the development to create a buffer between the existing and the new development area. This can be accomplished utilizing similar lot sizes, open spaces, aesthetics, to what currently exists in Clover Valley developments; this way the new development will compliment the existing residences. Those new residents buying lots/homes in this "buffer area" will have full disclosure that they are moving next to a high density tract project.
- Houses should not be hanging on hillsides above existing residents such as what appears to be planned on Summit Drive and on a small cul-de-sac above Wood Glen Court. This is unsightly.
- Some of the traffic issues could be reduced by providing access to houses in the new development which are comparable to existing residences through Rawhide Road. If this portion of the community were gated, it would <u>permanently</u> restrict access to Rawhide Road and Midas.

- Reduce Clover Valley Parkway to a two-lane road. This subdivision should not be used as a vehicle to remediate prior traffic planning errors, while creating new ones.
- Higher density homes should be situated on the opposite side of the valley from existing residents.
- It would appear that all problems relating to this subdivision are the result of an extremist effort to put 800+ homes in a narrow valley which contains minimal infrastructure at any cost. We believe Rocklin residents consider this is unacceptable. Lower overall density within the subdivision would solve all problems the subdivision faces.
- Meaningful conservation easements should be considered in the project beyond unbuildable areas and flood plains. Creation of these areas not only enhances value to the City, it also may create value to County, State, Federal or nonprofit conservation organizations who may provide revenue for preservation and profit for the developer.
- Further, as commented during the workshop in December, we are concerned about the impact on local schools. This project adds approximately 1,000 children to the area and provides no disclosed accommodations for schools. This project is not justification for the next public bond issue or citywide fee assessment.

As expressed, the disclosed effects of this project represent only the "tip of the iceberg". Sufficient evidence exists that the impacts of this project will be far greater than what has been represented to date.

Thank you for the opportunity to provide feedback to the City regarding the EIR. Please call should you have any questions.

Sincerely,

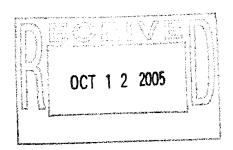
CONCERNED CLOVER VALLEY RESIDENTS (Contact Person: Irene Grover)

City Council
Planning Department
U.S. Fish and Wildlife Services
State Department of Fish and Game
California Oak Foundation
Horseshoe Bar Municipal Advisory Council
Sierra Club, Motherload Chapter
Sierra Club, Placer Group
Concerned Citizens of Rocklin
Save Our Rocklin Environment
Rocklin Residents United
Rocklin Alliance

Duane D. Wilson

October 11, 2005

David Mohlenbok, Director Community Development Dept. City of Rocklin 3970 Rocklin Road Rocklin, CA 95677



Dear Mr. Mohlenbok:

RE: Clover Valley Lakes Development

The proposed development of Clover Valley highlights a problem that has seriously impaired the healthy growth of Rocklin: lack of vision on the part of elected officials. Even a lay person can observe the uneven growth – sprawling suburbs and virtually no significant retail growth. The recent plans for intelligent development of a downtown area is 10 years or more tardy and primarily driven by private individuals rather than elected officials. This is the climate in which the Clover Valley Lakes development needs to be viewed. The potential of Clover Valley was overlooked by these elected officials and in 1997 they signed a development agreement allowing outside developers to build another housing project without any thought to the areas potential. The right of property owners is certainly important, but city council members are elected to serve the best interests of people and not to make sure a few individuals maximize their profits.

Clover Valley, if properly developed, would truly enhance the quality of life for all citizens of Rocklin and even the citizens in the surrounding area. What valley city – other than Chico – has such a resource within their city limits? Not just another park (which are themselves valuable) but a nature and historical area that would make Rocklin unique. City officials use the lame excuse of no money, but having talked personally with many private groups and officials from state and local governments I have found many willing to provide funding for such a project. During the last three years not once have any of those approached reported contact on the part of Rocklin's city government. Even minimal efforts on the part of city government could have resulted in the state Indian museum being located in the valley which would have been a major financial boast for the city and its residents. Even today I believe the United Auburn Indians would seriously consider building a 10 million dollar cultural center in the valley.

This perspective is important because it is these elected city officials that will make the final decisions re: the Clover Valley Lake Development. Fortunately it is not too late to correct the mistakes of the past. If the city will honestly respond to the information provided by individuals and agencies regarding the following issues (and many others) they can significantly modify the development plan and preserve a significant portion of the valley. In the process prevent long term environmental damage and enhance the quality of life for all Rocklin residents. This can be done and still not deprive the property owners of more an adequate return on their investments. It is really a win-win situation for all parties – all it takes is some courage and integrity on the part of involved government agencies, city departments and elected officials.

Reasons modification of the original development plan is necessary are as follows:

Cultural Resources: The following quotes are taken directly from the Peak & Associates, Inc. report titled "A Determination of Eligibility and Effect on Cultural Resources Within the Clover Valley Lakes Project Area" prepared for Rocklin 650 Ventures and dated January, 2002.

Page 63: "The Project essentially encompasses a unique geographic feature, a spring fed drainage enclosed by steep hill sides adjacent to the treeless expanse of the Sacramento Valley. The prehistoric sites present represent a wide variety of site types – large and small occupations sites, large and small campsites, special activity areas including food processing stations and a rock art site. ... Several of the prehistoric period resources, ..., have temporally diagnostic elements that are representative of an unbroken, almost 4,000 year time span."

Page 64: ... "The 4,000 year period of use and/or occupation at the sites within the proposed Clover Valley Archeological District covers a critical period of prehistory in the region. Postulated to have occurred during this period were the introduction of new technologies ... and a shift in cultures from an earlier Hokan-speaking entity to a Penutian, and presumably Proto-Nisenan, entity." And further down page 64: "The proposed Clover Valley Lakes Archeological District appears to qualify for the National Register of Historic Places (NRHP) under criterion d, for its potential to yield information. Some of the problem domains include cultural chronology, economic (subsistence and exchange systems), settlement systems, and acculturation."

Page 65: "The question concerning the cultural history of the Nisenan in the area is also of critical importance." ... "Given the distribution and nature of the sites, the resource diversity characteristic of the ecological contact zone, and the tantalizing ethnographic/historic data, the proposed Clover Valley Lakes Archeological District will provide information important in prehistory, and is therefore, potentially eligible to the National Register of Historic Places. All 33 prehistoric period sites may be considered contributing sites to the District."

"Initiation of the Project will have an adverse effect on the proposed NRHP district primarily through direct construction impacts for residential development, parks, roadways and other infrastructure improvements. Even if direct impacts could be avoided to some of the individual sites in the district, indirect impact could occur through vandalism or artifact collection by the new residents and other individuals using the facilities. The sites to be left in open space areas may also be subject to vandalism by opening up to the general public previously access-controlled areas."

"Most of the sites now lie in their natural unaltered setting, appearing much as it did in the prehistoric period of significance. Overall, the alteration of the landscape for the construction of modern features will alter the setting, feeling, and association aspects of integrity of the district." I have quoted at length from the Peak cultural report because the statements made by an agency that is pro-development (Peak and Associates) listed more than enough reasons why the development should be modified. It is also clear reading the Peak report why the information in the report was not included in the 2002 DEIR. Failure to include the report is a clear indication the City of Rocklin wants to develop Clover Valley even if it is not in the best interest of the citizens they represent. Since it is documented that the city received the report eight months before the 2002 DEIR was released, it would be naïve to come to any other conclusion.

Why any government agency would want to destroy such a valuable archeological site is beyond reason. This is especially true because Clover Valley is one of the last undisturbed sites in the foothills region. The reason a cultural report is required is to provide information necessary to make intelligent decisions on approving or disapproving a development. If the results of the report are to be ignored there would be no reason to pay to have the report done in the first place. Given the track record of the City Council, the hope to save this valuable historical site rests with the integrity of the city, county, state and federal agencies that are themselves funded with citizen dollars and created to serve the people of our community.

One further note on the cultural issue: Since a significant portion of the potential land area on which cultural sites might be found are (and have been) covered in vegetation (specifically black berries and wetlands) and were unavailable for exploration of Peak and Associates, I request a more complete cultural survey be ordered by the city.

Wetlands: Identification and delineation of wetlands has become an important topic. The prevailing condition in the U.S. is that wetland laws are applied in new manners as compared to historic applications. No net loss of wetlands is the current goal. The 2002 DEIR listed 22 acres of wetlands – has this been updated? Even a cursory survey in 2005 can see that the acreage of wetlands has expanded? This increase needs to be taken into account. Have the wetlands in the project area been deemed jurisdictional wetlands? Since the wetlands are not above the headwaters of the water drainage system they cannot be labeled as isolated wetlands and should require a permit for any modification.

As of now, most of Placer County's water has been supplied by the run-off from the Sierra snow-pack, In 2004 the Placer County Water Agency met with the Placer County Board of Supervisors and advised that unpredictable run-off can no longer be counted on to satisfy the increasing water demands of our growing population. The Agency recommended that the county focus on developing existing underground water sources. The unique two mile long catch-basin known as Clover Valley – with it's wetlands acting as a filter and it's year-round creek feeding the aquifer – can be an important resource to supply our escalating water needs. However, if 558 homes are built in the valley this resource would be lost forever – again an example of lack of vision. Control measures can be attempted but the end result will be the pollution of the stream and the wetlands.

Also to be considered is the potential to contaminate not only the ground water under Rocklin – eliminating wells as a source of water – but also the contamination of the

ground water under Roseville. What is Rocklin's legal exposure? These environmental risks should be evaluated and appropriate provisions made for potential costs to the city.

Setbacks of 'an average of 50 feet' are tantamount to destroying wetlands (as well as the riparian corridor) and need to be extended to a minimum of 100 feet (an 'average' allows for significant abuse).

Culverts in the Clover Valley creek for road crossings are cheap for the developer but expensive in the long run for the city. Despite the design they will fill in and need difficult and expensive servicing. Are culverts going to be allowed? If so, why? In addition to the cost factor, culverts are destructive to fish, beaver, otter, amphibians and other wildlife. Have studies been completed on the impact of culverts as opposed to bridges?

Air Quality: The many developments and increased traffic in the Rocklin area are already pushing air pollution levels above acceptable levels. Adding additional housing, cutting down thousands of mature oak trees, and dramatically increasing traffic will only add to the problem. Recent studies have established that air pollution damages brain development in small children, causes illness in elderly citizens and has a severe negative impact on people with breathing difficulties. Air quality is an important issue and it is not responsible public policy to continue adding to a problem that is already a serious health issue.

Further, a study should be conducted on how the project will impact the air quality in the valley itself. Being a narrow valley with steep sides, air pollutants will be trapped along the floor of the valley. If developed, new residents may very well be moving into an area that will seriously damage their health — especially the children and the elderly. A study of this predictable health issue needs to be completed prior to any approval of the development.

Traffic: Needed is a comprehensive traffic flow study to include the entire area — especially the impact on Highway 65, Park Blvd, Sierra College Dr. and Interstate 80. The Clover Valley Lakes project was approved in 1997 and since then there have been dramatic increases in traffic throughout the entire area. The accumulative impact of Sunset Ranchos, Bickford Ranch, Twelve Bridges and the near future sprawl of Lincoln all must considered.

- Valley View Parkway: proposed to connect Park Blvd. with Sierra College Drive by crossing Clover Valley, the road has many problems:
 - 1. The road will funnel thousands of cars onto Rocklin streets. Very little traffic from Rocklin goes N.E. as the shopping and jobs are west of Rocklin. However, the new developments N.E. of Rocklin will use the road as a shortcut to avoid going through Lincoln and to access Hwy. 80. Of what value is the road to Rocklin residents? The impact of this road is entirely negative.

3446 Parker Street Rocklin, CA 95765 October 5, 2005

Dave Mohlenbrok Planning Dept. City of Rocklin 3970 Rocklin Rd Rocklin, CA 95677

Dear Dave Mohlenbrok:

I am writing to you to express my concerns about the proposed development in Clover Valley. Not only do I **not approve** of this development, but I think that the City of Rocklin would be making a poor decision if this development were to commence. I understand that the city wants the revenue that the development would most certainly bring, but in the case of Clover Valley, the monetary gains are minimal compared to the historical and cultural impacts that abound in this valley. I am sure that you are aware of the 33 historical Native American sites that are in this valley, not to mention the numerous creatures that use this valley as their home and for migratory purposes. The decimation of over 7000 oak trees is deplorable! The developer claims that it intends to save some of the valley, but with the proposed amount of houses of over 500 at 1 acre apiece, you tell me where there will be left over land that is to be saved for historical and cultural purposes?!.

The traffic that this development will surely bring is also a huge concern. I live off of Stanford Ranch road and will be having children going to Granite Oaks Middle School in the near future, so increased traffic that runs near schools such as Granite Oaks, Twin Oaks and Rocklin High is surely a disaster that will inevitably happen. I have lived in the Bay Area and have seen small cities such as this one, blossom into huge ones with traffic congestion and higher accident rates due to increased population. Air pollution goes hand in hand with increased traffic and I would hate to see our beautiful city aglow with the murky brown haze that cars bring.

I know that the city has only money in its eyes, but just think of the reputation and precedence that the city would set if it set aside its greed for growth and just let this one small jewel be as it is—pristine. If this development were set to a vote to the residents of Rocklin, I am sure that you would see a resounding vote for "no project" from the citizens of Rocklin.

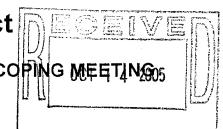
Thank you for letting me voice my concerns.

Regards,

Elizabeth Woll

Clover Valley Project





COMMENT FORM

To be added/corrected on our mailing list and to document the author of comments received, please provide the following information. Thank you.

Address: 2706 Ashland Court, Rocklin CA 95765
Organization: Residents of Rocklin
Please provide us with your written comments on the scope of the EIR by 5:00 pm, October 14, 2005.
David and I wish to express our deep concern recording the Clover Valley Project. We have lived here since April of 2001. Before that we lived in the East Bay where we were born and raised. We have two daughters - ages 6 and 9. We were alerted about this development project about two wears ago by the Save Clover Valley aroanization. Keep in Mind that we come from the Bay Area (Plasant Hill) where they do a much better job, than Rock I in and sur rainding areas, of preserving open space and historical areas. We are asking that hock lin research everything extremely well before a juica flear about the project. All aspects need to be looked into Please do not be distacted by the money being canaded out there by the developers. The developers don't we here and will quickly be gone with their profit when the project is camplete. We are specifically Concerned with air pollution, which is already a big problem and will only at worse with each new development. My husband and I have I was problems which are worsened by the dirty and I have I was problems which are worsened by the dirty.

(Prior to mailing this form, please fold form so that address on back is clearly visible, and attach necessary postage)

air here in Rocklin. I hate to think about what it is doing to our children! We need more large parks, more trees, more natural open space, not less. We should be preserving Clover Valley like Roseville preserved Maidu Park. It's a great educational experience. Drinking water quality is also a concern for us. And flood control is an important issue to consider as well. We have a large creek [Pleasant Grove Creek-I think] behind our house and we are concerned it might overflow with all the extrarunoff caused by the new project, during the winter storms. Also our roadways are already very busy. Stanford Ranch, Sunset Blud., Park Drive, and Pleasant Grove are all jammed up at high traffic times. Valley View Parkway [Clover Valley Parkway] 15 a bod idea and will not help the problem but will only make it worse! Plus all the added noise and pollution will directly affect my family and hundred sof others who live close to Park Drive and other affected roads. Though we bought into a community that was Seven years old when we moved here, the original vision for Stanford Ranch and Kocklin was made known to us bymany people and it did not include all of this! Plus the City of Rocklin already has trouble keeping up with maintenance and litter pick-up. For example, many people in our neighborhood are unhappy with the rows of fences lining Farrier Koad. Some are falling down, some are in need of >

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repainting-body, some were repaired but never painted to match the others [these are now water - stained from
to match the others I these are now water stained from
the sprinklers]. It looks awful! We paytoo much in
maintenance tax for this to be so. Adding more homes
in Rocklin will only stretch our work crews thinner.
Please remember, you should multiply letters
Please remember, you should multiply letters like mine by 100 atleast, because many people [I
know] feel as we do but are too busy to take the
time to write you. People care about these things
but sometimes feel that they can't change anything
So they don't even try. It's a shame.
thank you for your time,
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Lusti Ehrhardt
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David and Kristi Ehrhardt
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APPENDIX C