

Ethnographic Setting

During the time of European contact the proposed project area was inhabited by a group of California Indians known as the Valley Nisenan Maidu. The Valley Nisenan settled and built their villages on low, natural rises in close proximity to streams and rivers.

Archeological Setting

Numerous archeological field investigations have resulted in the identification of numerous archeological finds adjacent to the proposed project site. Within the project site, previous archeological investigations have been of a surface survey nature. The surveys reveal that the project site, in addition to the project vicinity, are highly sensitive concerning the occurrence and potential occurrence of prehistoric archeological sites.

The sites identified within the project are generally located on terraced areas adjacent to drainages. This strongly suggests that the area was inhabited by the Valley Nisenan Maidu and their ancestors during prehistoric times. Early excavations conducted by California State University, Sacramento and American River College have revealed that Indian inhabitation of the project site and general vicinity occurred from as early as 500 B.C. to after 1850 A.D.

Numerous artifacts have been found within the project area. These include:

- o Ground stone tools
- o Bowl mortars
- o Slab mortars
- o Bedrock mortars
- o Chipped stone tools
 - Projectile tools
 - Flakes
 - Core tools

Historic Setting

Recorded explorations into the project area included:

- o Spanish under Gabriel Moraga (1806-1808)
- o Fur trappers led by Jedediah Smith (1827, 1828)

Significance of Identified Cultural Resources

Prehistoric Sites. The majority of the prehistoric archeological sites consist of bedrock mortar features, with little or no evidence of diagnostic artifacts. However, these sites are important sources of regional information concerning prehistoric food resources and processing activities. At the present time, no identified sites exhibit a cultural significance to be recommended for National Register evaluation. Two of the recorded prehistoric sites (numbers 28e and 28h, see Appendix H for detailed description of the sites) reveal evidence of being relatively complex prehistoric village locations with cultural resources of potentially high significance which may make them eligible for National Register of Historic Place consideration. These two sites contain information regarding the duration of prehistoric occupations, sociocultural systems of the Valley Nisenan Maidu Indians and their ancestors, their settlement patterns, and their activities.

Historic Sites. The majority of the historic sites, in addition to the stone fences and granite bridges are of regional significance as remnants of the Whitney Ranch era in the Rocklin area. However, at the present time, these identified historic sites are not of a significance high enough to be recommended for National Register evaluation.

Summary. Evaluation of the identified archeological and historic sites and features located within the proposed project site indicates that the majority of the recorded sites are not of National Register significance with the exception of two sites (numbers 28e and 28h, see Appendix H for detailed description of these sites), that are potentially eligible for National Register consideration. However, further subsurface investigations may identify archeological features and information contrary to surface investigations.

Impacts

All of the identified prehistoric, ethnohistoric, and historic cultural resources located within the project site could be potentially subject to adverse impacts by implementation of the proposed project. The cultural resources that would be most severely impacted are subsurface sites. The prehistoric and historic sites with recorded and suspected midden and cultural deposits would be subject to the most disturbance. Table 14-1 identifies the sites and their relative potential for adverse impacts as a result of project implementation. Assuming proper implementation of the mitigation measures, potential adverse impacts regarding cultural resources are expected to be less than significant.

**RE-ELECT KATHY
LUND
CITY COUNCIL**

Dear Neighbor:

Contrary to what you might have heard, I have **not** taken a position on Clover Valley Lakes. Before making a decision, I need to hear all sides of the issue. The final environmental report has not been completed and there will be testimony at both the Planning Commission and City Council hearings. I will make an **informed decision after all information is presented.**

I want to make one thing clear: **I will not support removal of the gate on Rawhide and traffic coming down Rawhide and Clover Valley Road to Midas.**

I have asked for more information on the Estate Subdivision Alternative, which calls for 30,000 square foot minimum lot size and fewer lots.

I would support leaving the area in open space; however, the land is privately owned and would have to be bought in order to leave it that way. The City does not have the money to do that. The vote on taxing ourselves to pay for Placer Legacy tells me that the residents of Rocklin do not want to tax themselves in order to keep Clover Valley Lakes open space.

My husband and I raised our kids in this neighborhood. We have no plans to leave. My son, his wife and their three kids are building a new house in Rocklin. Our family has roots here. I will keep the future needs of my grandkids, and yours, in mind when making all decisions.

You know me. I have represented you for some time. I ask you to ask yourself one question: **Who has the best interest of what affects our neighborhood, someone who lives in Stanford Ranch, or someone who lives in our neighborhood?**

Sincerely,

Kathy

*Background
Mailed
FALL 2002
to Rocklin
zip -*

Letter 62

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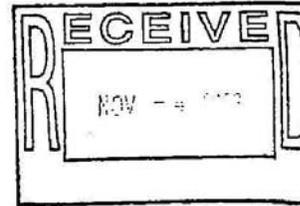
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Hand-Delivered

November 4, 2002

Sherri Abbas, AICP
Planning Services Manager
City of Rocklin Planning Department
3970 Rocklin Road
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Re: Draft Environmental Impact Report for Clover Valley Lakes Large Lot
Tentative Subdivision Map Project (State Clearinghouse Number 93122077).

Dear Ms. Abbas:

Handwritten initials

I am writing on behalf of the proponents of the Clover Valley Lakes Large Lot Tentative Subdivision Map Project ("the Project"), which is the subject of above-referenced Draft Environmental Impact Report ("DEIR"). I want to take this opportunity to present their views regarding the state of the planning process for the Project. More specifically, I shall address the limits on the discretion of the City of Rocklin ("City") either to reduce future housing unit totals beyond those that the applicant is now proposing or to impose additional mitigation measures beyond those that have already been approved or are currently proposed in the DEIR.

*Why
wasn't
this
included?*

Many of the issues I will address relate to concerns raised by members of the public who, for whatever reason, did not become involved in the earlier planning efforts that resulted in 1997 in annexation of the Project area to the City and approval by the City Council of General Plan amendments, prezones, and a Development Agreement ("DA"). Although I have no reason to believe that the City itself does not understand the limited nature of its discretion with respect to the specific proposals that are the subject of the DEIR, the applicant believes that the public dialogue would be well-served by a clear explanation of the legal constraints that will govern the City's actions carrying out the general policy decision embodied in the 1997 approvals. There are three sources of significant legal limitations on the City's discretion. The first is the DA itself, which contains numerous provisions intended to protect the applicant's right to

LETTER 39: SAVE CLOVER VALLEY (MARCH 3, 2006)

Response to Comment 39-1

Please see Response to Comment 23-2.

Response to Comment 39-2

2/23 DEIR hearing was advertised in the Notice of Availability that was distributed to the project's mailing list. The project's mailing list consisted of responsible, trustee and other public agencies, property owners within 600' of the project site, people who commented on the 2005 NOP, people who commented on the 2002 DEIR, and those that requested to be on the project's mailing list. The meeting was also advertised in the Placer Herald on January 18, 2006 the advertisement included a map to the meeting location.

Response to Comment 39-3 and 39-4

The construction of the Valley View Parkway is included in the buildout of the City of Rocklin General Plan. The proposed project, along with other projects in the area, would be required to contribute fair-share fees toward the development of the proposed roadway. The proposed project's contribution to the construction of the Valley View Parkway do not relate to the adequacy of the DEIR, as the proposed project is in compliance with the City of Rocklin General Plan buildout.

Response to Comment 39-5

Valley View Parkway would provide a new access route for all Rocklin citizens, including children and senior citizens. Schools in the City of Rocklin have been planned in proximity to arterial roadways, and appropriate design has been provided for pedestrian access. The DEIR analysis indicates that no significant traffic impacts are anticipated in proximity to schools near Valley View Parkway. See Section 3 of Master Response 4 - Traffic

Response to Comment 39-6

See Master Response 13- Growth Inducing Impacts.

Response to Comment 39-7

The DEIR discusses problem pollutants and their general health effects on pages 4.5-3 and 4.5-3 of the DEIR. Carbon monoxide, which is a localized pollutant, was analyzed using available air quality models and compared to state and federal ambient air quality standards in impact 4.5-3 on page 4.5-15

The DEIR utilized a conservative (over-predictive) method to estimate carbon monoxide concentrations at worst-case intersection. Concentrations were estimated at locations within

20 feet of the most congested intersections in an effort to obtain the highest concentrations that might be expected to occur at any location affected by project traffic. These predicted worst-case concentrations were included in Table 4.5-5 on page 4.5-16 of the DEIR. Because these concentrations are for worst-case locations, concentrations at nearby schools, senior housing, residences or any other sensitive receptor would be less than those shown in Table 4.5-5.

The DEIR utilized the significance thresholds of the Placer County APCD. The threshold of significance carbon monoxide is a predicted violation of the California Ambient Air Quality Standard. Worst-case predicted concentrations were found to be substantially below the state standards considering both the addition of project traffic and cumulative traffic increases, so carbon monoxide impacts were determined to be less than significant.

The other two problem air pollutants in the Rocklin area are ozone and particulate matter. Both these pollutants have been shown to be correlated with adverse health effects. However, predicting the increases in health effects is not possible for the following reasons:

1. Estimating long-term concentrations of pollutants such as ozone and particulate matter (PM₁₀ and PM_{2.5}) resulting from an indirect source of air pollutants such as the project is not possible. Project emissions do not just occur on the project site, but are spread over several counties. Forecasting changes in ozone levels or particulate matter due to an individual project is not practical, given that ozone and a portion of urban particulate matter are a result of a complex series of photochemical reactions in the atmosphere. Computer models of photochemical ozone/particulate matter formation capable of providing a project-caused concentration change described both spatially and temporally would require massive amounts of weather and emissions data. While such models do exist they are typically used in the development of regional air quality plans, and are not usable for forecasting effects of an individual project.
2. Even if spatially and temporally distributed project-related concentrations could be generated, information on dose-response relationships is lacking that would allow a quantitative analysis of health effects. While general correlations between pollutant concentrations as measured in urban environments and such factors as hospital visits or deaths from respiratory diseases such as asthma, bronchitis or lung cancer have been established, this does not establish a causal relationship for any one pollutant.

Since the impact of an indirect source cannot be determined in terms of concentration, the Placer County Air Pollution Control District, like other air districts across the state, have recommended that project impact significance be not based on a specific change in projected concentration, but is based on a mass emission. This analysis is discussed in Impact 4.5-2 of the DEIR, which concluded that the project, without mitigation, would have a significant impact for both ozone and PM₁₀.

Response to Comment 39-8

Section 5.4 of the RDEIR identifies both project-specific impacts related to loss of oak trees, and cumulative impacts to biological resources, as significant and unavoidable. Loss of individual oak trees as a percentage of total oaks on the site is estimated at 26.3 percent (RDEIR page 4.8-26). Damage to oaks during construction is discussed in Impact Statement 4.8I-2, and would be minimized with the implementation of Mitigation Measure 4.8MM-2 (page 4.8-27).

Response to Comment 39-9

Many terms are used: site, archeological resource, cultural resource, historic property, historical resource. From *National Register Bulletin* 15 are the following definitions:

A site is the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined or vanished, where the location itself possesses historic, cultural, or archeological value regardless of the value of any existing structure.

A district possesses a significant concentration, linkage, or continuity of sites, buildings, structures or objectives united historically or aesthetically by plan or physical development.

The resources will be managed according to plans reviewed and approved by cultural resource professionals. The RDEIR notes that effects to archaeological resources are potentially significant. (RDEIR 4.7-33) CEQA Guidelines suggest significant effects may be mitigated several ways; by preservation in place, i.e., avoiding archaeological sites, incorporating them within open space, covering them, or deeding them into a conservation easement. Where a resource cannot be avoided CEQA states data recovery through excavation mitigates for the effects to the resource when the scientifically consequential information is recovered and a report is prepared and deposited with the California Historical Resources Regional Information Center. (CEQA Guidelines 15126.4(b)(3)(C))

The RDEIR notes that the project site design has been revised to avoid resources; thus implementing mitigation by avoidance. (RDEIR 4.7-33) Other forms of mitigation such as preservation and protection by fencing or data excavation will be required for all impacts to resources through the federal National Historic Preservation Act Section 106 process. (See Master Response 7 – Cultural Resources) Mitigation by avoidance, preservation and data recovery provide a means of preserving the scientifically consequential information so that knowledge of earlier inhabitants is not lost, but preserved. This preservation of knowledge serves to reduce the impacts to resources to a less than significant level because what can be learned from a resource has been captured and reported prior to construction activity.

Response to Comment 39-10

The City of Rocklin has reviewed several cultural resources reports pertaining to the project site, as noted on page 4.7-1 in the RDEIR. In accordance with CEQA Guidelines Section 15064.5, the City has determined that the potentially significant impacts identified as resulting from project implementation would be adequately mitigated through observance of the mitigation measures included on pages 4.7-34 through 4.7-40 of the RDEIR.

Response to Comment 39-11

Most of the sites in the project area will be preserved. For those not subject to preservation, the Historic Properties Treatment Plan (HPTP) will be developed allowing the recovery of data from the sites, thereby gathering the information the sites can provide. This plan will be reviewed and approved by cultural resource professionals at state and federal agencies.

Response to Comment 39-12

As shown in Table 4.2-2 of the RDEIR (p. 4.2-5), the General Plan Amendment and Rezone accompanying the proposed project would increase land designated for open space and roadway landscaping (Recreation/Conservation [R/C]) from the current 69.9 acres (11.2 percent of the project site) to 365.9 acres (58.8 percent of the site). Stated differently, only 41.2 percent of the project site would be developed under the proposed project. This amount is less than half of what the current land use designations allow. The proposed open space and roadway landscape lots are shown in detail on Figures 3.4(a) through 3.4(f) in the RDEIR Project Description.

Proposed measures of protection for the on-site cultural resources are detailed within the project Historic Properties Management Plan (HPMP). Due to the sensitive nature of the information contained in the HPMP, this document is not available for public review. Please refer to page 4.7-33 in the RDEIR for further information. The Open Space Management Plan (“OSMP”) under development as part of the federal NHPA Section 106 process will control the management of the biological values of the open space.

Response to Comment 39-13

The failure to include preservation of cultural resources as a project objective does not reflect a lack of concern for cultural resources on the part of the applicant or the City. As is evident throughout Section 4.7 of the RDEIR, extensive efforts are being undertaken to preserve cultural resources on the project site. The applicant has demonstrated significant concern for cultural resources by initiating consultation with Tribe representatives and redesigning the site to accommodate the Tribe’s and the City’s concerns. To reflect this fact, Project Objective #3 on page 3-11 of the RDEIR is hereby amended to read: “Preserve Clover Valley Creek and minimize impacts on other significant on-site natural and cultural resources through appropriate project design.”

Response to Comment 39-14

As is true with all of the listed Project Objectives, Project Objective #1 pertains specifically to the proposed project, not other projects that may or may not occur in the future on different project sites. “Existing transportation corridors” refers to roadways such as Interstate 80, State Route 193, Sierra College Boulevard and the others described on pages 4.4-3 and 4.4-4 of the RDEIR. In other words, the 558 dwelling units included with the proposed project would increase the City’s housing supply in close proximity to those existing roadways.

The proposed Valley View Parkway is one of the "General Plan roadways" referred to in Project Objective #5. The General Plan Amendment requested by the project applicant would include a modification of the Circulation Element to reduce the original plan for a four-lane roadway to two lanes (RDEIR, p. 4.2-5).

Response to Comment 39-15

See Response to Comment 39-3 and 39-4.

Response to Comment 39-16

The City of Rocklin’s travel model was utilized in the transportation analysis. This travel model has a year 2025 scenario that provides a 20-year planning horizon. This planning horizon is utilized by the City to plan its roadway infrastructure, and considers the cumulative effects of land development anticipated over the next twenty years. The reference to the SACOG Guidelines is presumed to reference the SACOG Blueprint for regional land use planning. The project is consistent with a number of elements of the SACOG Blueprint. See also Section 1 of Master Response 4 – Traffic.

Response to Comment 39-17

Alternatives to development in and around current wetland areas are addressed in Chapter 6 of the DEIR. Because of the nature of the project, the only feasible alternatives to avoid the potential impacts to wetlands would be the no project alternative or the reduced buildout alternative (see pages 6-6 and 6-8 of the DEIR). Impacts related to seasonal wetland habitat are addressed in Impacts 4.8I-4 and 4.8I-5. These impacts and their associated mitigation measures include provisions to ensure that the proposed project is consistent with the standards set forth by the Corps, which is achieved through the Corps permit approval process.

Response to Comment 39-18

The proposed off-site sewer extension is addressed throughout the RDEIR, including on pages 3-13 through 3-15, and pages 4.12-8 through 4.12-11. A final alignment for the sewer line has not been chosen as of this writing. However, as noted on page 4.12-11 of