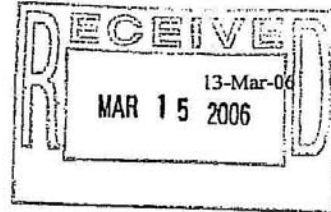


Letter 165

Sherrri Abbas
Planning Services Manager
3970 Rocklin Road
Rocklin, CA 95677



RE: Project#: SD-98-05, Clover Valley Re-circulated Draft EIR Comments

Attached is a list of additional specific comments for the published EIR. This is my second letter to you for this project and this package represents a second unique set of comments. In this letter are some overall comments and high level observations. I have an extensive background in technical document review (24 years) and so I hope these comments bring to light some of the issues with this document. One thing I do know about document review is that for every two defects you find in a document there will probably be one that you did not see. Also, the process of revising a document will introduce additional defects that you must find after another review. In my opinion, this document contains numerous flaws and therefore is insufficient as a decision making guide. Clover Valley is a special place for many of us and I would like to see a higher quality document to guide our decision making process.

General:

165-1

NOP Comments – The method for summarizing the NOP comments was inadequate. Numerous comments were missing from the summarized list. I listed as many as I found up to letter referenced as number 40. I ran out of time to review letters 41-127. I found one missing letter that was not inventoried. Out of 40 letters I found approximately 33 missing NOP summary items. I did not have time to check if all of these summary comments were not covered but I did find a few in my limited time. The process here seems to be broken. A large number of people and organizations spent a large amount of their precious time to present NOP comments and from this cursory analysis there are a large number of comments that were not summarized and ignored during the analysis. The document should include a detailed appendix of the comment analysis and classify each comment such that it is accurately included in the comment summary. Typically comments are numbered and then referenced as to which summary item they fall into. This way the authors of each section can easily find the specific comments which related to their areas.

165-2

Transportation and Circulation: The appendix for this work appears to have a large hole. Park drive intersections were not analyzed for impact even though huge numbers of letters asked this issue to be addressed. This road has the single largest percentage impact of this entire project with a projected 700% increase in traffic volume yet the intersection analysis was not completed.

Summary:

165-3

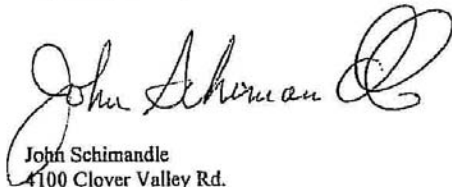
I would recommend the following process be followed on the next draft of this EIR to assure completeness and accuracy. If you would like, my services are available to oversee this process at my standard consulting rate.

1. Detailed analysis of all NOP comments
2. Detailed analysis of draft EIR comments
3. Set standards for the use of common terms within the document. Such as significant, potentially significant, less than significant, etc.
4. Each section is corrected as best as can be done by the individual teams based on all comments.
 - a. Each team must demonstrate they have covered all the comments which are pertinent to their section
5. Perform an interaction analysis on all sections to see where findings in one section may impact other sections.
 - a. This would include things like how water quality impacts biology or how grading and fill may impact ground water
6. Update sections based on the interaction analysis

165-3
Cont.

- ▲ 7. Peer review to check for correct use of standard terms, omissions, factual errors, misleading statements and inconsistencies
8. Publish document for community review
- Note that community members may be available at each step to review interim outputs of the process as a double check to make sure the process is accurate.

Respectfully Yours,



John Schimandle
4100 Clover Valley Rd.
Rocklin, CA 95677
916-316-8566

Attachment: Clover Valley Recirculated Draft EIR Comments (3 pages)

165-4

165-5

Page	Identifier	Comment	type
1-7	list of letters	Between 3 and 4 in Appendix B was a letter from Cheryl Hoffman a Rocklin Resident that was omitted from the list. I will refer to this letter as 3.1.	omission
1-10	Aesthetics	Comment from Cheryl Hoffman (3.1): protecting views from the ridge home into the valley.	omission
1-10	Summary of Issues	General comment for all sections from Joe Bentz (40) was not listed. Comment: Should use more up to date studies.	omission
1-10	Summary of Issues	General comment for all sections was mentioned in many letters. Comment: Study the interactions between areas. For example, how increase noise in the valley will impact wildlife, Increased peak storm flow on creek will impact creek biological resources.	omission
1-10	Transportation and Circulation	Comment from CHP(13) and Town of Loomis(19): Effect on the already overburdened transportation system, specifically I80.	omission
1-10	Transportation and Circulation	Comments from many letters should be used to expand upon the Public Safety bullet. Specifically, the following should be enumerated. Pedestrian Safety, School Bus Safety, Increase Vehicle Accident Rates, Sierra College and Valley View Parkway Intersection.	omission
1-11	Air Quality	Comment from many letters: How shape of valley concentrates or increases pollution	omission
1-11	Biological Resources	Comment from Fish and Game (14): study habitats outside of this development area that could be impacted by the development.	omission
1-11	Biological Resources	Comment from Fish and Game (14): Is the conservation strategy of Placer County followed	omission
1-11	Biological Resources	Comment from Dry Creek Conservancy(21): Impact of light on wildlife	omission
1-11	Biological Resources	Comment from Audobon Society(25): Nest sites can only be destroyed after 2-3 years of non-use.	omission
1-11	Biological Resources	Comment from letters: Post development pet population impact on remaining habitat	omission
1-11	Biological Resources	Comment from letters: Compliance with migratory bird act	omission
1-11	Cultural and Paleontological Resources	Comment from Doug Brewer: Analyze historical significance of known artifacts.	omission
1-11	Cultural and Paleontological Resources	Comment from letters: Rock Wall Preservation within the valley	omission
1-11	Geology	Comment from letters: impact of disposal of unused soil materials	omission

165-5
 Cont.

1-11	Geology	Comment from Audobon Society(25): Study alternative road paths to reduce cut and fill.	omission
1-12	Alternatives	Comments from letters: limit development to maximum sewer line capacity	omission
1-12	Cummulative Effects	Comment from many letters: need list of other projects and analysis of their effects. This includes past, present and probable future.	omission
1-12	Hazards and Hazardous Materials	Comment from Town of Loomis(19): Sierra College near Taylor Road railroad crossing safety due to increased traffic.	omission
1-12	Hazards and Hazardous Materials	Comment from Union Pacific(27): Railroad corridor safety near property	omission
1-12	Hazards and Hazardous Materials	Comment from Dana Wiyhinger(7): Mosquito abatement	omission
1-12	Hazards and Hazardous Materials	Comment from Dana Wiyhinger(7): past land uses and potential hazards	omission
1-12	Hydrology and Water Quality	Comment from Joe Bentz(40): study the use of spanned bridges instead of culverts as creek bed disturbance mitigation	omission
1-12	Hydrology and Water Quality	Comment from Joe Bentz(40): study the use of off creek detention ponds instead of the proposed in creek detention ponds	omission
1-12	Hydrology and Water Quality	Comment from Placer Mosquito(11): Detention basins should drain within 72 of a storm event	omission
1-12	Hydrology and Water Quality	Comment from Placer Mosquito(11): Minimize irrigation run off	omission
1-12	Hydrology and Water Quality	Comment from Placer Mosquito(11): Maintenance of storm water system.	omission
1-12	Hydrology and Water Quality	Comment from Placer Mosquito(11): Inspection and maintenance access to storm water system.	omission
1-12	Hydrology and Water Quality	Comment from Town of Loomis(19): future needs of Loomis need to be taken into account when studying water availability.	omission
1-12	Hydrology and Water Quality	Comment from letters: nutrient and fertilizer impacts to water supply	omission
1-12	Hydrology and Water Quality	Comment from Joe Bentz(40): Length and duration that temporary soil stock piles will be maintained and how this impacts water quality.	omission
1-12	Hydrology and Water Quality	Comments from many letters including 4, 14, 21 and 22: 50 foot creek set back in insufficient to protect the creek system.	omission
1-12	Summary of issues	Section for Cummulative Effects was missing	omission
1-12	Transportation and Circulation	Comment from Caltrans(15): Caltrans would like to be involved in the traffic study.	omission

165-6	appendix D	entire appendix	Park Drive traffic volumes are impacted the most from this development as they increase from 1100 today to 7800. This is a 700% increase in traffic and is the largest increase in the study. Yet there was no intersection analysis done for critical intersections on Park Drive. Specifically, near Granite Oaks Middle School, the Elementary School and Park and Stanford Ranch. Many letters asked for a detailed analysis of Park Drive and this was not done.	omission
165-7	appendix E	entire appendix	This appendix is not organized very well. Does not have page numbers that can be referenced for comments. There is no overall summary of what is being presented. I figured it out after a while but an introductory summary would be appreciated	concern
165-8	appendix G	entire appendix	There was nothing new in this section. As a matter of fact it appeared exactly as the section was included in the main chapters of the DEIR. Could have eliminated it.	extraneous
165-9	E-4	Unit Type	Acerage specified in the simulations is incorrect. Specified at 186 but really is 198. No explanation given for using the lower number.	factual
165-10	E-4	Unit Type	The trips per day associated with each home is of some concern. What is this number based upon. I know that most Rocklin residents drive often as the city is designed for driving. Is 9 trips representative for the Rocklin community, especially like Clover Valley Lakes which is far away from retail stores.	factual
165-11	K-9	Removals	First paragraph states that soil on the valley floor is not suitable for construction due to compaction requirements. This means that large quantities of earth will need to be removed and replaced or require in-place densification. In appendix A of appendix K, subsurface exploration logs, indicate the presence of ground water very near the surface at many locations in the valley floor. Yet there is no analysis of the impact to ground water contamination in the Hydrology and Water Quality section. Whenever ground water is exposed by grading or mechanical action it can be adversely impacted. Building on this site will expose a large amount of ground water and greatly disturb the ground water flow as soils are replaced or densified in-place. The impact on Hydrology and Water Quality must be analyzed.	omission
165-12	M-6	second paragraph	unsolicited comment regarding the spectacular beauty of Clover Valley. This comment should have made it into the Aesthetics section. I'm sure unsolicited comments like these don't happen in all EIRs.	omission

LETTER 165: SCHIMANDLE, JOHN (MARCH 13, 2006)

Response to Comment 165-1

NOP comments were generally summarized on pages 1-10 through 1-12 of the DEIR. Summary items were not listed specifically, but all comments were considered during the preparation of the DEIR. While the DEIR attempted to address all pertinent NOP comments, the DEIR is not required to do so with comments not from responsible agencies, trustee agencies, and federal agencies. Per CEQA Guidelines section 15375, “the purpose of the notice is to solicit guidance from those agencies as to the scope and content of the environmental information to be included in the EIR.” “Pertinent” comments are not defined in CEQA statutes or guidelines; the lead agency for the project, the City of Rocklin, made the determination of which comments were relevant to the analysis of environmental impacts and incorporated those comments as appropriate.

Response to Comment 165-2

As noted on page 4.4-5 of the DEIR, the Park Drive and Valley View Parkway intersection was studied. For updated figures in all conditions, see Response to Comment 28-1.

Response to Comment 165-3

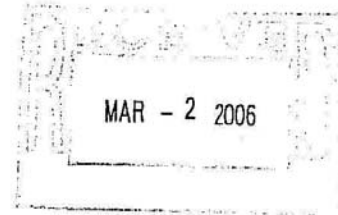
This comment recommends a review and revision process for the preparation of the Final EIR and does not address the adequacy of the DEIR.

Response to Comment 165-4

See Response to Comment 165-1.

Letter 166

February 28, 2006



Robert and Shari Servin
5200 Argus Court
Rocklin, CA 95677

To The Rocklin City Planning Department:


We have recently been notified that the Rocklin City Council has approved plans for the development of 622 acres, referred to as Clover Valley, for 558 homes, roadways and a retail center.

We are strongly opposed to the development of this area. We moved from San Jose to Rocklin last year for the very reason that Rocklin still had many open areas such as this. It is imperative that we try and preserve as much of this open space as possible to keep Rocklin distinctive from the surrounding areas that are filling up all the empty land with new commercial and residential developments.

Further, the preservation of Clover Valley Creek and wetlands, the oak woodlands, the birds of prey, deer and coyotes should be of concern as well. The destruction of such a pristine and thriving environment would be a shame.

We urge you to reconsider the development of Clover Valley and to put some form of restriction on unlimited growth and development in Rocklin.

Thank you for your consideration.


Shari Servin
Robert and Shari Servin

166-1

LETTER 166: SERVIN, ROBERT AND SHARI

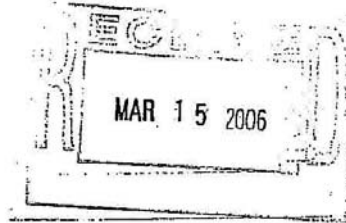
Response to Comment 166-1

The comment letter states opposition to the project and supports the preservation of the oak woodlands and wildlife in the project area. The letter does not address the adequacy of the DEIR.

Letter 167

March 14, 2006

Sherri Abbas, ACIP
Planning Services Manager
City of Rocklin
3970 Rocklin Road
Rocklin CA 95677



Subject: Comment to Re-Circulated Draft Environmental Impact Report (Draft EIR) - Clover Valley Large and Small Lot Tentative Subdivision Maps – Project # SC-98-05

Dear Ms. Abbas:

The proposed mitigation measure for the loss of oak trees associated with the Clover Valley Subdivision Project (the Project) violates applicable City of Rocklin Ordinances and should not be approved.

The draft EIR includes a mitigation measure for impacts associated with the loss of oak trees on site (mitigation measure 4.8MM-1(a)). The proposed mitigation measure states that “the Developer will establish the oak tree preserve as described in the 1997 Development Agreement” (pg. 2-35). However, the oak tree impacts associated with this project do not meet the criteria set forth in the 1997 Development agreement. Consequently, any mitigation for impact to oak trees associated with this project must comply with the City of Rocklin Oak Tree Ordinance as set forth in Section 17.77.100 of the City of Rocklin Municipal Code.

The 1997 Development Agreement would only apply to this project if: “the number of oak trees which may be removed by the Developer does not exceed the greater of 25 % of the Project’s total oak tree diameter at breast height or 25% of the total number of trees in the Project” (pg. 4.8-26 ¶ 3). According to the Developers consultant, the total number of on site trees to be removed is greater than 26% of the total number of on site trees (page 4.8-37 ¶ 5).

As a result, the proposed mitigation for the loss of on site oak trees associated with this project must comply with the City of Rocklin Oak Tree Ordinance, not the 1997 Development Agreement. In conclusion, the proposed mitigation measure in the Draft EIR does not comply with local Ordinance and needs to be modified accordingly.

Sincerely,

A handwritten signature in cursive script that reads "Monica Eames Seyfried".

Monica Eames Seyfried
Certified Arborist #WE-1259A

167-1

LETTER 167: SEYFRIED, MONICA EAMES

Response to Comment 167-1

The comment states that the project does not meet the criteria as expressed in the 1997 Development Agreement regarding maximum tree removal, and is therefore subject to the City of Rocklin Oak Tree Ordinance rather than the Development Agreement. As stated in the second paragraph on page 4.8-26 of the DEIR, “although the total loss of trees is approximately 26.3 percent, for the purposes of the Development Agreement, the number of trees removed as a result of the project equates to 20.5 percent and is therefore in compliance with the Development Agreement.” The Development Agreement states that any trees removed for roadway construction are not a part of the maximum of 25 percent tree removal agreed upon in the Development Agreement. Therefore, the project is in compliance with the Development Agreement’s maximum tree removal counts.

Letter 168

David Mohlenbrok

From: Charles Sheaffer [chasnann@sbcglobal.net]
Sent: Friday, March 10, 2006 4:48 PM
To: David Mohlenbrok
Subject: Clover Valley Subdivision Project (SCH #93122077)

David Molenbrok, Senior Planner
City of Rocklin

I have reviewed the environmental impact report for the Clover Valley Subdivision Project and have concerns about the traffic impact on Park Drive. I find no reference in this report to any requirements for new traffic signs or traffic lights along Park Drive and I believe that this oversight should be addressed prior to approval of the final plan.

Park Drive cuts through the Springfield adult community with more than 850 homes occupied by Senior Citizens. Four unprotected streets enter from Springfield onto Park Drive south of the proposed Valley View Parkway and Park Drive intersection and three partially protected streets enter onto Park Drive west of the proposed Valley View Parkway and Park Drive intersection. Currently the four entries onto the south leg of Park Drive have neither stop signs nor stop lights for Park Drive traffic, while the three entries onto the west leg of Park Drive have stop signs only for Park Drive traffic. In addition, I find no reference to traffic control signals at either the proposed Valley View Parkway and Park Drive intersection or the intersection of Crest Drive and Park Drive.

I believe that the projected increase in traffic would present a serious hazard for the Seniors living in Springfield unless some real consideration is given to the addition of more stop signs and upgrading to stop lights at key intersections. I strongly recommend that this matter be addressed in the final environmental impact report.

Charles R. Sheaffer
3848 Coldwater Drive
Rocklin, CA

168-1

03/10/2006

LETTER 168 SHEAFFER, CHARLES R.

Response to Comment 168-1

The effects of additional traffic have been analyzed in Section 4.4 of the DEIR. Increases in traffic on Park Drive will not cause degradation in operating conditions beyond the level of service “C” standard maintained by the City of Rocklin. Please refer to the response to comment 28-1.