

Letter 65

03/28/2006 15:46

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CITY OF ROCKLIN CDD

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*Dear Mr. Magnuson -
Please accept these comments -*

SUMMARY COMMENTS ON CLOVER VALLEY JANUARY 2006 RDEIR-

CITY OF ROCKLIN
3978 Rocklin Road
Rocklin, CA 95677
to C/C 3-27-06
also CAU, RAH JA
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- 65-1 The January 2006 Clover Valley RDEIR is inadequate and contains many errors and flaws. Flaws include omission of environmental impacts, impacts that are underestimated, and the need for additional maps and information. Comments given above (pages 1-12) identify and describe these flaws and omissions. Since there are so many changes needed to this DEIR, a revised DEIR is needed. Recirculation of a revised DEIR must be required to give the public and trustee agencies an opportunity to review the changes before a final EIR can be prepared.
- 65-2 As proposed, the Clover Valley project will result in alteration of the existing drainage pattern and substantially degrade surface water quality of Clover Valley Creek and the associated wetlands.
- 65-3 The construction of the biketrail in the creek setback will result in grading, paving and loss of vegetation in the "protected, Open Space corridor" and will degrade water quality of Clover Creek. The biketrail needs to be eliminated from within the 50 foot creek setback. Incorporating the biketrail into the proposed road system on Nature Trail Way and Forest Clover Road would reduce creek and wetland impacts and reduce mitigation needed for impacted wetlands.
- 65-4 As recommended by CDFG, residential lots adjacent to the creek need to be eliminated to reduce impacts to the most sensitive areas of the project site. The DEIR does not address or explain why it didn't address CDFG's request to eliminate lots 71-95 which are adjacent to Clover Valley Creek.
- 65-5 The DEIR does not evaluate the negative impacts from the loss of wildlife movement and wildlife corridor. This is an omission. Wildlife movement and wildlife corridor are currently unrestricted for the entire project area. Requirements for "no fencing" or wildlife friendly fencing only, especially in the riparian corridor and wetland areas, need to be strictly applied and enforced to allow for movement of species. An east to west and north to south wildlife corridor should be created for the project area devoid of bike trails, roads, fencing, structures, or public hiking trails.
- 65-6 The total loss of wetlands for the project needs to be recalculated due to impacts from the biketrail (TS-1 through TS-4), Nature Trail Way (southern part of TS-2), and the detention basins. The loss of wetlands due to the construction of Nature Trail Way, utility encroachments, and the biketrail is not correctly determined. Although the biketrail is shown to directly abut or cross ACOE identified wetlands on tentative maps TS-1, TS-2, TS-3, and TS-4, these areas have not been accounted for in the total wetland loss calculations. A re-verified wetlands map signed off and approved by ACOE needs to be presented in the revised DEIR. Wetland impacts and losses need to be reevaluated and included in the revised DEIR.
- 65-7 The current stormwater evaluation lacks thoughtful consideration. The water drainage plan needs a lot of work. The water drainage plan as described in the DEIR is vague and

**Letter 65
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65-7
Cont. ↑ not well thought out. A final design plan needs to be completed and presented in the revised DEIR. A project of this magnitude requires innovative technology and use of swales, out of stream detention basins, and vegetated drainage corridors in the project design plans, not piping of high velocity, sediment laden stormwater to the environmentally sensitive areas of the project, i.e. Clover Valley Creek and the wetlands. In-stream detention basins for stormwater system design are a very bad idea that will contribute significantly to the degradation of water quality and filling of the creek and the wetlands. Alternatives or combinations of alternatives to in-stream detention basins must be presented in the revised DEIR. After the developers have walked, the City of Rocklin will be responsible for the non-point source pollution and degradation of water quality of Clover Valley Creek due to this project.

65-8 The surface area of the detention ponds needs to be calculated at maximum stormwater capacity and the period of time storm water will be impounded needs to be included in the DEIR. The maximum surface area of the detention ponds needs to be shown on a map and provided to the trustee agencies. Potential for erosion and scouring of Clover Valley Creek downstream of the detention basins needs to be evaluated in the DEIR.

65-9 "The conceptual bridge designs are inconsistent with the CLOMR application and the hydrologic modeling needs to be revised" (Pg. 4.11-13). The master drainage plan is incomplete (pg. 4.11-13). The 2001 CLOMR from FEMA is based on a drainage system that is not yet designed (pg. 4.11-13). The drainage system is conceptual at best and is likely to change from the 2001 proposal. Due to inconsistencies, potential changes, and lack of a specific drainage plan, a new detailed flood hazard analysis needs to be completed for this project.

65-10 According to the DEIR, the proposed detention basins are expected to "fill with sediment" and the maintenance of the detention basins (pg. 4.11-28) includes "removal of excess sediment" (i.e. dredging). If dredging is not performed, the DEIR states that downstream flooding may likely occur (pg. 4.11-11). The DEIR does not evaluate the impact of likely dredging in Clover Valley Creek and the wetlands. The FEMA CLOMR needs to evaluate the potential for downstream flooding due to buildup of sediment in the detention basins and other parts of Clover Valley Creek.

65-11 A water quality monitoring program must be designed with the approval of the Regional Water Quality Control Board, the lead regulatory agency for non-point source discharges and degradation of water quality. A third surface water sample point needs to be added in Clover Valley Creek at the mid-development point. Baseline documentation of the water quality in Clover Valley Creek must be conducted prior to ground breaking. Baseline documentation of the existing water quality of Clover Valley Creek is essential for determining water quality impacts due to the project. Water quality analyses, including biological or aquatic surveys, needs to be submitted to the Regional Water Board and made available to the public. Water quality monitoring of Clover Valley Creek needs to occur for a minimum of 5 years post development or a maximum of ten years post development; 2 years as recommended in the DEIR is insufficient.

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- 65-12 An on-site environmental compliance officer needs to be hired by the City of Rocklin for the duration of entire project. The duties of the environmental compliance officer should be to ensure compliance with the pre-construction monitoring, conditions of the various permits, mitigations required by the EIR, maintenance of barriers for protected areas, and to communicate problems immediately to the City of Rocklin.
- 65-13 Staging areas for the various phases of construction need to be determined prior to the start of the project and shown on a map. Staging areas need to be distanced from the creek, wetlands, steep slopes, and cultural resources. The environmental compliance officer needs to strictly enforce the boundaries of the staging areas in the field.
- 65-14 Tentative maps TS-4 and TS-5 need to be corrected (see Project Description Section, page 1 of these comments).
- 65-15 The proposed project will contribute to urban sprawl, the hallmark of Rocklin. The project destroys one of the last remaining Open Spaces within the city limits. This project is an example of extremely poor urban planning because it places sprawled development at the outer fringes of the city limits, adding to traffic, noise, pollution, and destruction of scenic view and the environment. The project will be built on pristine land which currently exists as a greenbelt and community separator for the City of Rocklin.
- 65-16 Cumulative impacts are not adequately evaluated in the DEIR. During public hearing on February 23, 2006, comment referred to 500 additional homes planned for development north of the proposed Clover Valley development and 50 homes south. The cumulative impacts from existing and additional planned development near the project site are not discussed in the DEIR.

Thank-you for allowing these comments. I look forward to a response to these comments in a revised DEIR.



Jo Bentz
9990 Graton Road
Sebastopol, CA 95472

LETTER 65: BENTZ, JO (MARCH 27, 2006)

Response to Comment 65-1

This is an introductory comment that references an earlier letter submitted by the commenter (letter 64). This comment does not address any specific issues within the EIR.

Response to Comment 65-2 through 65-15

These comments are a verbatim repetition of comments received by the City in the commenter's March 8, 2006 letter (letter 64). The Responses to Comments 65-2 through 65-15 can be found in the corresponding Responses to Comments 64-44 through 64-57.

Response to Comment 65-16

See Response to Comment 64-42.

Letter 66

Mr. David Molenbrok
Senior Planner
City of Rocklin

Joseph/Barbara Berry
4506 Scenic Drive
Rocklin, CA, 95765

Dear Sir,

March 7, 2006

After a long and thoughtful search, my wife and I carefully selected the community of "Springfield" for our retirement. Foremost among our criteria were the peace and quiet currently afforded us in our present residence.

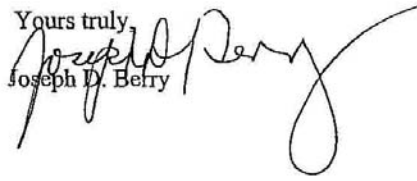
66-1

We sincerely believe the housing development planned for Clover Valley would seriously diminish the overall quality of life we have found here through greatly increased vehicular traffic and attendant noise.

For those principal reasons and their anticipated deleterious effect on the very nature of our retirement community, we exhort you to cancel this project.

Yours truly,

Joseph D. Berry



LETTER 66: BERRY, JOSEPH

Response to Comment 66-1

This comment states that the proposed project would have impacts to traffic and noise and that the commenter is opposed to the proposed project. As noted in the EIR, several impacts related to traffic and circulation would be significant and unavoidable. The City Council would be required to submit a statement of overriding considerations of these significant and unavoidable impacts should the proposed project be approved. Impacts related to noise generation were found to be less-than-significant.

Vince Beusan
P.O. Box 524
Loomis, Ca 95650

March 1, 2006

City of Rocklin
Mr. David Mohlenbrok
Senior Planner
3970 Rocklin Road
Rocklin, CA 95677

Letter 67



RE: Clover Valley Development

Dear Mr. Mohlenbrok,

I want to tell you that I fully support the project on Clover Valley and I believe that **the EIR has addressed all the necessary issues.**

I believe that this project will improve the area greatly and will benefit all residents living in the area.

If it was up to the environmentalists, we would still be living in caves and walking from place to place for even riding horses would be animal abuse to them.

Thank You,

Vince Beusan
P.O. Box 524
Loomis, CA 95650

67-1

LETTER 67: BEUSAN, VINCE

Response to Comment 67-1

This comment expresses support for the Clover Valley project and the adequacy of the EIR.

Letter 68

Feb. 28, 2006

Mr. Dave Mohlenbroke
Rocklin Planning Dept.
3970 Rocklin Rd.
Rocklin, CA. 95765

Dear Mr. Mohlenbroke,

I was unable to attend the meeting on February 23, but I do want to express my deep concern about the proposal to develop Clover Valley. I feel that there are very few open spaces left which are conducive to wildlife habitat. We must not let this habitat be destroyed.

I understand that the development company is now the legal owner of the property. Is there any way the city can regain ownership of it? Perhaps float a bond issue to buy it back or trade it for other city-owned property?

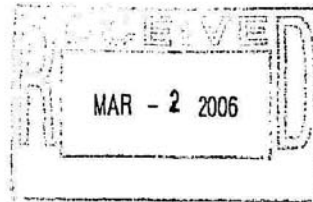
If the City is legally bound to allow building there, a much smaller development should be planned with stipulation that the natural environment must be maintained.

I am glad the Planning Department has been holding public meetings and is taking all our concerns under consideration. Thank you.

Sincerely,



Mary Bischel
3201 Santa Fe Way #120D
Rocklin, CA 95765



68-1

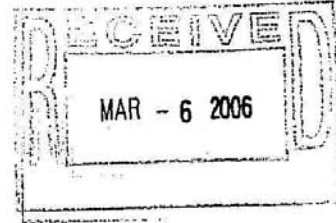
LETTER 68: BISCHEL, MARY

Response to Comment 68-1

This comment addresses concerns over wildlife habitat, but does not address the adequacy of the RDEIR. See Mitigation Measures 4.8 MM-1 through 4.8 MM-15 as described in EIR Chapter 4.8.

Letter 69

February 27, 2006



To the Rocklin City Planning Department

Re: The proposed Clover Valley development

- 69-1 **I am sorry I was not able to attend the public hearing Thursday, February 23rd meeting. The following will give you some idea of how strongly I (and many of my friends) feel against the proposed Clover Valley development. My ideas are not different from those you are hearing left and right but hopefully will add to the fodder needed for this movement.**
- 69-1 **My home is in the Springfield Adult community at Whitney Oaks. Like so many of the other residents, I moved here for a quiet retirement, free of traffic, noise and pollution. As well as pure enjoyment of the oak woodlands, birds, deer and, yes, coyotes.**
- 69-2 **Now developers want to remove all that enticed us here in the first place. The trees. We are told that every tree removed will be replaced. Who do they think they are kidding? When the development is completed there will be no room left to replant any trees let alone replacing tree for tree. If so, why is it necessary to remove any tree in the first place?**
- 69-3 **Traffic, noise and pollution. Park blvd. runs through Springfield and proposals are for extending it across Clover Valley to Sierra College blvd. I can't even imagine how severely this will disrupt the tranquility of our community.**
- 69-4 **The overview suggests that greedy developers want to destroy a lovely valley. The only winners here are the developers because the disruption of the woodlands, the birds and animals means destruction for our existing surrounding communities. The developers flourish at our expense.**

DO NOT LET THIS HAPPEN!

Marjorie L. Bonadonna
3896 Coldwater Dr.
Rocklin 95765

LETTER 69: BONADONNA, MARJORIE, L.

Response to Comment 69-1

This comment does not address the adequacy of the EIR.

Response to Comment 69-2

See Sections 2, 3 & 4 of Master Response 8 – Biological Resources.

Response to Comment 69-3

This comment opposes more traffic along Park Drive. With regard to traffic, as described in DEIR Chapter 4.4, the impact from increased traffic on local streets in project site vicinity will be less-than-significant with no Mitigation Measures required. The project applicant shall include in the project design receiving lanes for northbound and westbound right-turn lanes at intersection of Valley View Parkway and Park Drive. See also Response to Comment 28-1.

Response to Comment 69-4

This comment does not address the adequacy of the EIR.

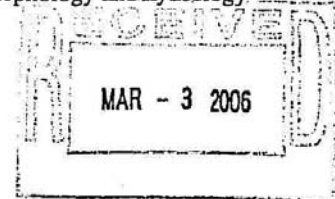
Letter 70

Clover Valley Project - #SD-98-05 DEIR Comments

To the lead agency:

My concerns center around critical fish habitat, the unique geomorphology and hydrology of this project, and particularly the limitations regarding:

- Narrow canyon & encroached flood plain
- Impervious cover of the existing soils
- Impervious cover of development
- Steep gradient of slopes
- Impact of upstream development



Consequence upon the wetlands and streambed are significant with inadequate studies and mitigation measures on the most pressing issue related to wetland functions:

People, Fish, and Wildlife	Hydrologic System Support	Water Quality Support
- recreation	- groundwater storage	- nutrient removal
- vegetation diversity	- base flow to streams	- detoxification
- endangered species	- flood storage & desynchronization	- processing inorganic solids
- shoreline stabilization	- flood energy & dissipation	- water temperature regulation
- breeding areas for water birds	- infiltration	- sediment trapping
- habitat for resident and anadromous fish	- interception	- phosphorous and nitrogen processing

Source: 1

Comments & Questions (addressing these issues listed above)

1. It's should be incumbent upon the City of Rocklin and developer to prove such a highly engineered project addresses the above issues related to wetland functions. I'm particularly concerned about increased flooding and water quality issues. The mitigation measures are inadequate, as addressed below.

Given the density of housing in such a narrow canyon, why hasn't this project looked at other comparable housing projects in Northern California to ascertain the following:

- a. What is a reasonable density for such a narrow canyon & watershed to avoid any increases in flow (cfs) downstream? Models show a decrease or slight increase in cfs, but common sense dictates adding more impervious

70-1

Letter 70 cont'd

cover (known as IC) will increase run-off and aggravate stormwater management. Normally this type of development would be rural residential or recreational / parkland. Yet 558 residential lots are proposed in the setting (described in the geologic section). Hydrological models are speculative, whereas examples are real and observable.

- Specifically, I cannot find any comparable high density precedent or example in this region (eastern Sacramento Valley) within this type of climate (Mediterranean) along ancient volcanic mudflows (lahars) extending up to Redding. Are there any comparable developments of this density? (Lincoln, Wheatland, Marysville, Oroville, Chico / Paradise, Red Bluff, Redding... nothing of this size exists in this comparable geologic setting exists.)
- Has the long-term climate patterns been examined, particularly in related to precipitation? Characteristics of California's Mediterranean climate include prolong summer droughts and intense extratropical storms during the winter. The climate in the past has experienced 50 year droughts, and conversely, it experiences frequent and intense El Nino type of winter storms. Temperatures in the past 20 years have been warmer than the past 1000 years, and global warming will like increase unstable weather and ultimately California's climate. The extremes of this climate range, including events of extreme precipitation, will matter because this project in this narrow canyon will be vulnerable to flooding.

70-1
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2. Where trees remain and where structures are placed makes a difference in calculating impervious cover and storm water run-off. Looking at Appendix J (Stantec report), the database of individual trees is of little value to critique without a map or GIS specifically linked to this information. The "Phase Layout" map is impossible to tell where exactly the trees are standing and what percentages they represent (e.g. Phase 4H – 182, 24, and 206 trees). Given the loss and removal of approx. 7422 oaks trees (roughly 26.3%) and other trees, scrubs, what percentage would be within:

- a. The 100 year flood plain?
- b. Within 100 feet of the streambed?
- c. Mitigation of urban runoff and storm water require large swaths of trees along **all** sides of the stream banks, especially given the geologic setting and high amount impervious cover (IC) from residential and road structures. According to Center for Watershed Protection (source: 2), one of

70-2