U.S. Army Corps of Engineers

WESTBROOK PROJECT
Final Environmental Impact Statement
USACE Action ID: SPK-2005-00938

U.S. Army Corps of Engineers
Sacramento District
1325 J Street
Sacramento, CA 95814-2922
(916) 557-6605

April 2014

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USACE Action ID: SPK-2005-00938

Prepared for:

U.S. Army Corps of Engineers
Sacramento District
1325 J Street
Sacramento, California 95814

Prepared by:

Impact Sciences, Inc.
555 12th Street, Suite 1650
Oakland, California 94607

April 2014

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ACRONYMS AND ABBREVIATIONS

AICP	American Institute of Certified Planners
BO	Biological Opinion
CAAQS	California Ambient Air Quality Standards
CARB	California Air Resources Board
CAPCOA	California Air Pollution Control Officer's Association
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CIP	Capital Improvement Program
COE	Carbon Dioxide Equivalent
CVRWQCB	Central Valley Regional Water Quality Control Board
CWA	Clean Water Act
DA	Department of the Army
DEIS	Draft Environmental Impact Statement
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
FEIS	Final Environmental Impact Statement
GHG	Greenhouse Gases
HCP	Habitat Conservation Plan
LAFCO	Local Agency Formation Commission
LEDPA	Least Environmentally Damaging Practicable Alternative
LID	Low Impact Development
LRTP	Long Range Transportation Plan
MGD	Million Gallons per Day
MOU	Memorandum of Understanding
MTP/SCS	Metropolitan Transportation Plan and Sustainable Communities Strategy
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
OSPOMP	Open Space Preserve Overarching Management Plan
PCAPCD	Placer County Air Pollution Control District
PCCP	Placer County Conservation Plan
PCTPA	Placer County Transportation Planning Agency
PCWA	Placer County Water Agency
PG&E	Pacific Gas and Electric
REO	Regional Environmental Officer
RHNA	Regional Housing Needs Allocation
ROD	Record of Understanding
SACOG	Sacramento Council of Governments
SCS	Sustainable Communities Strategy
SIP	State Implementation Plan
SOI	Sphere of Influence
SRTP	Short Range Transportation Plan
SVAB	Sacramento Valley Air Basin
SVSP	Sierra Vista Specific Plan
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency

USFWS	United States Fish and Wildlife Service
VELB	Valley Elderberry Longhorn Beetle
VMT	Vehicle Miles Traveled
WAPA	Western Area Power Administration
WPWMA	Western Placer Waste Management Authority
WRSP	West Roseville Specific Plan
WWTP	Wastewater Treatment Plant

1.0 INTRODUCTION

The Final Environmental Impact Statement (Final EIS) has been prepared to respond to comments received on the Draft EIS for the Westbrook project. The Final EIS has been prepared by the U.S. Army Corps of Engineers (USACE), Sacramento District in accordance with the requirements of the National Environmental Policy Act (NEPA). The USACE is the lead agency under NEPA.

On May 31, 2013, the USACE released the Draft EIS for public review and comment. The 45-day comment period closed on July 15, 2013. The Draft EIS evaluated the potential environmental effects of the Proposed Action and a range of alternatives, including the No Action Alternative, five on-site alternative development plans, and the Off-Site Alternative. Written comments were received from one federal agency and the Applicant. The USACE considered the comments received on the Draft EIS in the preparation of this Final EIS. The USACE consulted with the U.S. Environmental Protection Agency (USEPA), a cooperating agency for this project, during the preparation of the Final EIS.

In addition, since the publication of the Draft EIS, the USACE and the Applicant met with the U.S. Fish and Wildlife Service (USFWS) to review the impacts of the Proposed Action on federally listed species and the draft mitigation plan put forth by the Applicant. Based on discussions between the Applicant and the USFWS regarding federally listed species impacts, the Applicant has submitted a revised mitigation plan to the USACE and USFWS and made other changes to the Proposed Action. All of these changes have been incorporated into the Final EIS.

The Final EIS consists of the entire Draft EIS, and the comments, responses to comments, and revisions to the Draft EIS.

1.1 PURPOSE AND INTENDED USES OF THE FINAL EIS

NEPA requires a lead agency that has completed a Draft EIS to consult with and obtain comments from public agencies (cooperating, responsible, and/or trustee agencies) that have legal jurisdiction with respect to the proposed action, and to provide the general public with opportunities to comment on the Draft EIS. This Final EIS has been prepared to respond to comments received from agencies, organizations, and members of the public on the Draft EIS for the Westbrook project, which are reproduced in this document; and to present corrections, revisions, and other clarifications and amplifications to the Draft EIS made in response to these comments.

As described in the Draft EIS, development on the project site would require the filling of wetlands and other jurisdictional waters of the United States as defined by the Clean Water Act (CWA) (33 CFR 328.3). This discharge of fill material requires approval from the USACE pursuant to Section 404 of the federal CWA, 33 USC § 1344, under which the USACE issues or denies DA permits for activities involving a discharge of dredged or fill materials into the waters of the United States, including wetlands. The Applicant has submitted a Section 404 permit application in support of the Westbrook project. If the USACE approves the individual permit for the proposed land development, the Applicant would be allowed to fill approximately 9.61 acres (3.89 hectares) of wetlands and other jurisdictional waters of the

United States, and development of urban uses in the area would be a reasonably foreseeable outcome of the approvals. The Draft EIS and this Final EIS will be used to support the USACE's decision whether to issue a permit pursuant to Section 404 of the CWA and issue a record of decision (ROD).

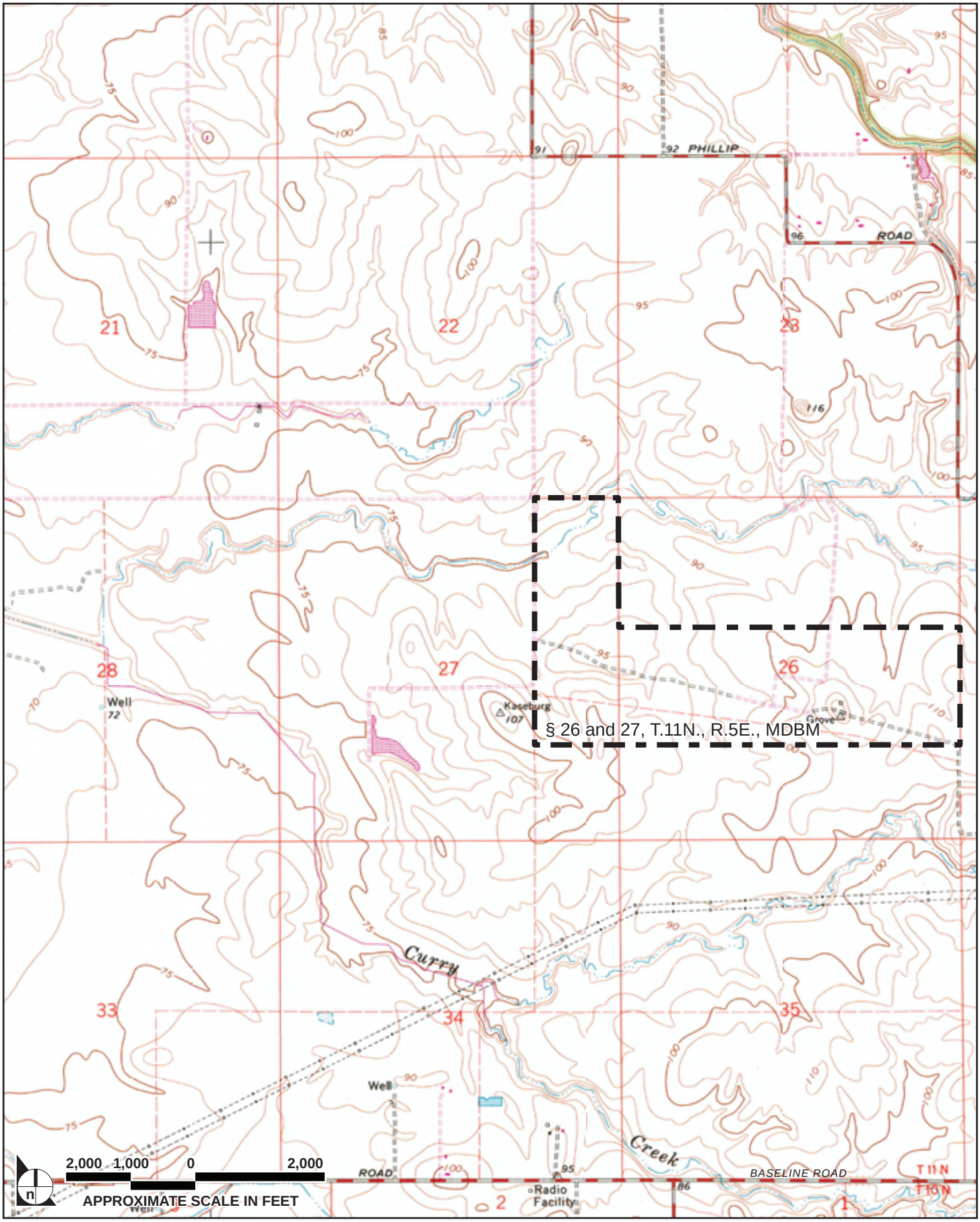
1.2 PROPOSED ACTION

The Proposed Action would implement the Westbrook project, which is the development of the approximately 397-acre (161-hectare) site with a moderate scale, mixed-use community. The community would include about 245 acres (99 hectares) of residential uses, 43 acres (17 hectares) of commercial and office uses, 11 acres (4.5 hectares) of public/quasi-public uses (such as schools), 16 acres (6 hectares) of parks, 36 acres (15 hectares) of open space, and 46 acres (19 hectares) of major roadways, and landscape corridors. With the exception of some improvements to and widening of an existing bioswale along the project site's northern boundary, no off-site improvements are needed to develop the project site.

The project site is located in the U.S. Geological Survey (USGS) Pleasant Grove quadrangle as shown in **Figure 1.0-1, Project Location,** and is characterized by gently rolling topography and large, open annual grassland areas. The entire project site has been disked, plowed, and dry farmed. The surface runoff within the project site flows to the north and west with the majority of the site draining to the north into an existing storm drain system that is located within Pleasant Grove Boulevard. The surface runoff on the eastern three-quarters of the site flows through a series of swales to the north to the existing storm drain system. The surface runoff on the western one-quarter of the site flows through a series of swales and an intermittent stream to the west.

Features of the human environment present on the site include a 50-foot (15-meter)-wide City of Roseville (City) electrical easement that crosses the site in a north-south direction (along the proposed alignment of Westbrook Boulevard). There are no existing structures or current agricultural activities on the site.

The project site is flanked to the north and east by the Westpark portion of the West Roseville Specific Plan (WRSP) area, which is under development, and to the south by the proposed Sierra Vista Specific Plan (SVSP) development, which has been approved by the City but is currently undergoing NEPA review by the USACE in support of Section 404 permit applications filed by the SVSP applicants. Lands to the west of the site are located within what is known as the Curry Creek Community Plan area, an area for which no development plans have been put forth and the Regional University Specific Plan, an area for which Placer County approved a specific plan in 2009.



SOURCE: USGS, 2012

FIGURE **1.0-1**

Westbrook Project Location

1122.001•12-13

1.3 PROJECT BACKGROUND

The project site has been identified by the City for potential development for a number of years. In 2004, the City annexed the WRSP area immediately north of the project site and adjusted the boundary of its Sphere of Influence (SOI) to align with that of the 5,500-acre (2,226-hectare) Transition Area between the City and Placer County, which had been defined in 1997 to foster cooperative land use planning under the terms of a Memorandum of Understanding (MOU) between the City and County. The WRSP designates a portion of the project site as one of two MOU Remainder Areas whose establishment was envisioned as "provid[ing] a platform for orderly and systematic future development consistent with General Plan Policies, the [City's] Guiding Principles, and the natural features of the land." Potential future development of a portion of the project site was analyzed at a program level in the City's WRSP EIR (City of Roseville 2004); and subsequent approval of the expanded SOI boundary by Placer County Local Agency Formation Commission (LAFCO) represented a wider recognition of likely future expansion of the City into the WRSP and Remainder Areas, including the project site. Then, as described above, in 2010, the City approved the development of the Sierra Vista Specific Plan (SVSP) and in January 2012, LAFCO approved the annexation of the SVSP site, including the Westbrook project site, to the City of Roseville. In June 2012, the City approved a General Plan Amendment and rezoning of the Westbrook project site from Urban Reserve to Low Density Residential, Medium Density Residential, High Density Residential, Commercial Mixed Use, Public/Quasi-public, Parks, and Open Space.

1.4 PROJECT PURPOSE AND NEED

The USACE has determined that the project purpose for the Proposed Action is to implement a moderate-scale, mixed-use, mixed-density master-planned community within or contiguous to the City.

For purposes of the EIS, the USACE defined the term "contiguous" as referring to all lands within 1 mile of the City's SOI boundary (the City's SOI is coterminous with the City limits except in the areas around the Creekview Specific Plan area and Amoruso Ranch).

The Proposed Action is defined as a "moderate scale" master-planned community project because it would develop approximately 360 acres (146 hectares) of land. The USACE does not consider it a large project based on a review of development projects proposed in western Placer County between 1990 and the present.[1] The USACE has determined that projects that develop more than 1,000 acres are large-scale development projects.

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1 Data regarding large-scale master-planned communities that were approved in western Placer County (jurisdictions of Roseville, Lincoln, Rocklin, and unincorporated Placer County) between 1990 and 2007 were documented in a memo dated August 15, 2007 prepared by the law offices of Sandberg, Lo Duca & Aland, LLP. Of the 12 projects that were approved, the largest was 5,230 acres in size while the smallest was 909 acres. Development projects proposed in western Placer County since 2007 include Creekview Specific Plan which involves a site of 748 acres; Regional University Specific Plan which involves a site of 1,157 acres; and Brookfield Specific Plan which involves a site of 1,350 acres. Based on these data, the USACE determined that a large-scale development project is at least 1,000 acres in size.

The Proposed Action is proposed as a "mixed-use" community as it comprises not only residential but also commercial uses, public and quasi-public uses, parks, and open space. The residential component of the project, which includes a range of housing types and residential densities, is proposed to help meet the foreseeable regional housing demand based on Sacramento Area Council of Government's (SACOG's) projections in the April 2012 Sustainable Communities Strategy (SCS) that the region will add 871,000 people by 2035, serve the diverse housing needs of the region, and assist the City of Roseville in planning for its share of housing needed in the region. The State of California Housing law mandates that communities plan for adequate undeveloped sites to meet their "regional housing needs allocation" or (RHNA). An important component of the City's General Plan Housing Element is the identification of sites for future housing development and an evaluation of the adequacy of these sites in fulfilling the City's share of the RHNA, which is determined by the SACOG. The intent of the RHNA is to ensure that local jurisdictions address their fair share of the housing needs for the entire region. Additionally, a major goal of the RHNA is to assure that every community provides an opportunity for a mix of affordable housing to all economic segments of its population. The 2013–2021 RHNA Plan, adopted in September 2012 by SACOG, mandates Roseville's share of the region's housing needs for all income categories as 8,478 additional units. The SVSP area, including the Westbrook project site, is the City's primary vehicle for providing the required units during the next planning period. Without SVSP (including the Westbrook project) the City would not be in compliance with RHNA (Government Code § 65583(a)(1)).

The commercial component is proposed because the commercial land uses would ensure that the City will collect sufficient tax revenue from the proposed community to provide necessary public services. The types of commercial uses included in the Proposed Action range from neighborhood commercial uses such as grocery stores to community shopping centers.[2]

According to the City, the project site is in an area identified by SACOG as appropriate for growth. The mix of land uses and the densities and intensities of the Westbrook project meet the densities identified in SACOG's 2004 "Preferred Blueprint Scenario" for this site. The SACOG Preferred Blueprint Scenario advocates densities and intensities higher than those traditionally seen in the Sacramento region as a means of reducing the severity of long-term environmental impacts. By making a more efficient use of land and facilitating pedestrian travel, bicycle use, and transit use, the combination of mixed uses and more compact development patterns would likely reduce per capita resource consumption (e.g., land, water, electricity, vehicle fuel, energy) and per capita pollution generation (e.g., traditional air pollutants and greenhouse gases).

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2 In addition to the convenience goods and personal services offered by the neighborhood center, a community shopping center provides a wider range of soft lines (wearing apparel for men, women, and children) and hard lines (hardware and appliances). Many centers are built around a junior department store, variety store, super drugstore, or discount department store as the major tenant, in addition to a supermarket. Its typical size is about 150,000 square feet of gross leasable area, but it can range from 100,000 to 500,000 or more square feet (Urban Land Institute 2004).

In April 2012, in compliance with State Bill (SB) 375, SACOG adopted an SCS in connection with its Metropolitan Transportation Plan (MTP) for a 2035 time frame. The Preferred Blueprint Scenario was used as the starting point in the development of the SCS. The SCS includes land use maps identifying areas that SACOG considered appropriate for development. The Westbrook property is included in these maps as a "developing community."

A primary purpose of SB 375 was to align regional transportation planning efforts, regional greenhouse gas (GHG) reduction targets, and land use and housing allocations with one another. Each SCS should include land uses consistent with regional GHG reduction targets determined by the California Air Resources Board based on statewide GHG targets mandated under the California Global Warming Solutions Act of 2006, commonly known as Assembly Bill (AB) 32 (Health and Safety Code Section 38500). The development of land identified for development in an SCS is therefore considered consistent with achieving AB 32 GHG targets.

Notably, in adopting its SCS in 2012, SACOG used population and market demand projections updated since 2004, when SACOG created its "Blueprint Plan," the pre-SB 375 predecessor to the SCS. As SACOG explained,

> *[t]he 2035 growth forecast indicates that population in the plan area is expected to grow by 871,000 people, an increase of about 39 percent, between 2008 and 2035. … [T]his forecast is lower than the 1.3 million people forecasted in the 2008 MTP, which had the same 2035 planning horizon, but used 2005 as the base year. As a result of the lower population forecast, the housing and employment forecast for the region is also lower than the forecast in the previous plan, resulting in the need to accommodate approximately 361,000 new employees and 303,000 new housing units between 2008 and 2035.*
>
> *A decline in domestic in-migration is the principal cause of the declining population projections, although the recent recession also contributes to declining population growth in the early years. The US economy is projected to grow at a slower rate, California is projected to get a smaller share of US job and population growth, and the region's economy is expected to recover at a slower rate than some other areas of the state, with state budget deficits restraining job growth in the public sector over the next decade. Although the region is expected to have a smaller job growth advantage than was anticipated in the 2008 MTP, the SACOG region is still expected to outpace the state and nation in job growth in the latter part of the planning period.*

SACOG characterized "developing communities" such as the Westbrook project as "typically, though not always, situated on vacant land at the edge of existing urban or suburban development; they are the next increment of urban expansion. Developing communities are identified in local plans as special plan areas, specific plans, or master plans and may be residential-only, employment-only, or a mix of residential and employment uses." In contrast, "lands not identified for development in the MTP/SCS planning period" are described as areas of the region that are not expected to develop to urban levels during the MTP/SCS planning period.

In short, SACOG, in adopting its April 2012 SCS for a period extending to 2035, assumed that the development of Westbrook project was consistent with both 2035 market demand projections and regional and statewide GHG reduction targets.

1.5 CHANGES TO THE PROPOSED ACTION

As noted above, based on comments received from the USFWS, the Applicant has made changes to the Applicant-proposed mitigation plan and other changes to the Proposed Action to minimize impacts on vernal pool invertebrate habitat. These changes are summarized below.

As described on page 2.0-13 of the Draft EIS, the Applicant proposed to create wetlands as well as provide floodwater storage and detention capacity within the open space preserve in the northwestern portion of the Westbrook project site. The Applicant proposed to use the created wetlands to partially mitigate the Proposed Action's impacts on waters of the U.S. The floodplain detention areas were proposed to comply with City requirements for storm water detention and flood control. The created wetlands and floodplain expansion area were planned to be located adjacent to the two intermittent streams that traverse the open space area and would have been created by excavating shallow depressions adjacent to the creeks.

In response to concerns expressed by the USFWS regarding indirect effects of these created wetlands and floodplain expansion areas on other existing wetlands and creeks present in the open space preserve area, the Applicant has revised the mitigation plan and will no longer create new wetlands within the open space area. The Applicant will instead purchase the necessary wetlands credits from an approved mitigation bank.

The Applicant will also not construct the floodplain expansion areas adjacent to the intermittent creeks. The Applicant has consulted with the City regarding storm water detention and flood control. The City has determined that adequate storm water detention capacity has been developed upstream of the Westbrook project site within the WRSP area. Therefore, the Westbrook project will need to provide only a limited amount of additional storm water detention capacity to ensure that the flows that leave the WRSP area via the culvert in the northwestern boundary of the Westbrook project do not exceed the capacity of the culvert. The project will provide the limited additional storm water detention capacity that is needed by expanding the existing bioswale along the project's northern boundary. As explained in the Draft EIS (page 2.0-13), runoff from the central portion of the site would be conveyed by subsurface storm drains into an existing storm drain in Pleasant Grove Boulevard along the northern boundary of the project site. As shown in Figure 2.0-4, included in **Chapter 3.0 Errata**, that storm drain currently discharges into an existing unlined bioswale that flows north between the Westbrook site and the adjacent Westpark residential development. The southern portion of the bioswale would be widened (Figure 2.0-5, included in **Chapter 3.0 Errata**) and a low berm would be installed within the bioswale to detain and slowly release the flows, which would then be conveyed to the north and discharged into an intermittent stream that would carry the runoff into the Westbrook open space area. This bioswale would be widened further to provide more detention capacity than previously planned.

1.6 AGENCY ROLES AND RESPONSIBILITIES

The USACE is serving as the lead agency for NEPA compliance.

The USEPA is participating as a cooperating agency. The USFWS was invited to participate as a cooperating agency but did not accept.

The following agencies and entities also have discretionary authority or legal jurisdiction over part or all of the Proposed Action, or special expertise relevant to the Proposed Action:

- USFWS
- California Department of Transportation (Caltrans)
- California Department of Fish and Wildlife (CDFW)
- Central Valley Regional Water Quality Control Board (CVRWQCB)
- City of Roseville

It is anticipated that as state agencies subject to the California Environmental Quality Act (CEQA) rather than federal agencies subject to NEPA, Caltrans, CDFW, and CVRWQCB will all rely on the Mitigated Negative Declaration adopted by the City in June 2012 and the SVSP EIR adopted by the City in May 2010 rather than on this EIS, in making their respective decisions on the Proposed Action.

1.7 SUMMARY DESCRIPTION OF PROJECT ALTERNATIVES

As discussed earlier in the chapter, based on their ability to meet the purpose and need of the Proposed Action and their feasibility as determined by the application of screening criteria, five on-site alternatives and one off-site alternative, were determined to be reasonable alternatives to the Proposed Action and were carried forward in the EIS for detailed evaluation along with the No Action Alternative. These alternatives are briefly described below.

1.7.1 No Action Alternative

Under the No Action Alternative, the project site would be developed in a manner that completely avoids the discharge of dredged or fill material in jurisdictional waters of the U.S., including wetlands, thereby avoiding the need for a permit under Section 404 of the Clean Water Act. The filling of all project site jurisdictional waters (12.55 acres) would be avoided. State and/or local approvals may still be required. The No Action Alternative may require authorization from the USFWS under the federal Endangered Species Act because of the potential for incidental take of federally listed species.

The No Action Alternative would involve development of portions of the approximately 397-acre (161-hectare) site, resulting in a reduced extent of residential and commercial uses. Avoidance of waters of the United States would reduce the total development footprint to 275 acres, comprising 177 acres of residential uses (1,505 residential units at buildout), 30 acres of commercial and office uses, a 10-acre school site, 2 acres of other public uses, 14 acres of parks, and 44 acres of roads. About 122 acres would be preserved as open space. With the exception of Mountain Glen Drive, which would be curved to

minimize open space crossings, roadway layout under this alternative would be substantially similar to the roadway layout under the Proposed Action.

As a result of the reduction in the community size, the demand for utilities under this alternative would be lower. As with the Proposed Action, no off-site improvements other than the widening of the existing bioswale would be required.

1.7.2 Reduced Footprint/Increased Density Alternative

This alternative would also develop the 397-acre (161-hectare) project site but would reduce the footprint of development within the site by increasing the acreage designated as open space, with the additional open space focused in areas that contain the greatest concentrations of sensitive habitat (vernal pools and/or drainages). The additional open space would be concentrated in the central portion of the site, east of La Sierra Drive and west of Westbrook Boulevard, and the eastern portion of the site, north of Mountain Glen Drive and west of Sierra Trail Drive. Based on its design, this alternative would fill about 3.1 acres (1.3 hectares) and preserve 9.47 acres (3.83 hectares) of aquatic resources on the project site.

Under this alternative, total acreage to be developed would be reduced by 26 percent to 267 acres (108 hectares), compared to 361 acres (146 hectares) under the Proposed Action, and open space would increase to 130 acres (53 hectares), compared to 36 acres (15 hectares) under the Proposed Action. The residential development footprint would decrease to 153 acres (62 hectares) compared to 245 acres (99 hectares) under the Proposed Action. However, residential densities would increase to accommodate a similar number of residential units (1,890 residential units would be provided under this alternative, compared to 2,029 residential units under the Proposed Action).

Acreage designated for commercial uses would be reduced slightly under this alternative and school acreage would remain the same. The location of roadways and commercial land uses would be largely similar to the Proposed Action, with Mountain Glen Drive and Sierra Trail Drive somewhat more curved to avoid open space areas. As with the Proposed Action and all the other on-site alternatives, no off-site improvements other than the widening of the existing bioswale would be required.

1.7.3 Reduced Footprint/Same Density Alternative

The Reduced Footprint/Same Density Alternative would have the same reduced development footprint as the Reduced Footprint/Increased Density Alternative described above, and would also fill about 3.1 acres (1.3 hectares) and preserve 9.47 acres (3.83 hectares) of aquatic resources on the project site.

However, unlike the alternative described above, under this alternative, residential areas would be developed at the same densities as the Proposed Action. As a result, this alternative would provide 1,405 residential units, compared to 2,029 residential units under the Proposed Action. Acreage designated for commercial uses would be reduced slightly under this alternative by comparison with the Proposed Action and school acreage would remain the same. The location of roadways and commercial land uses would be largely similar to the Proposed Action, with Mountain Glen Drive and Sierra Trail Drive somewhat more curved to avoid open space areas. As with the Proposed Action additional storm water detention capacity would be required (about 13 acre-feet [1.6 hectare-meters] under this alternative

compared to 18 acre-feet [2.2 hectare-meters] for the Proposed Action) which would require the construction of the floodplain expansion area near the project site creeks. As with the Proposed Action and all the other on-site alternatives, no off-site improvements other than the widening of the existing bioswale would be required.

1.7.4 Central Preserve Alternative

This alternative would reduce the footprint of development within the site by concentrating additional open space in a contiguous area that runs roughly north-south through the center of the site and expands the open space area in the northwest portion of the site. Based on its design, this alternative would fill about 5.03 acres (2.04 hectares) and preserve 7.51 acres (3.04 hectares) of aquatic resources on the project site. Under this alternative, total acreage to be developed would be reduced 25 percent to 271 acres (110 hectares), compared to 361 acres (146 hectares) under the Proposed Action, and open space would increase to 126 acres (51 hectares) compared to 36 acres (15 hectares) under the Proposed Action. The residential development footprint would decrease to 162 acres (66 hectares) compared to 245 acres (99 hectares) under the Proposed Action. As residential densities would remain similar to the Proposed Action, the total number of residential units under this alternative would be about 1,415. Acreage designated for commercial and school uses would be similar to the Proposed Action under this alternative. The location of roadways and commercial land uses would be largely similar to the Proposed Action, with Mountain Glen Drive and Sierra Trail Drive somewhat more curved to avoid open space areas. As with the Proposed Action and all the other on-site alternatives, no off-site improvements other than the widening of the existing bioswale would be required.

1.7.5 One Acre Fill Alternative

Under the One Acre Fill Alternative, areas on the project site containing waters of the U.S. would be preserved as open space such that no more than 1 acre (0.4 hectare) of jurisdictional waters would be filled to build the land development and the vast majority of the project site aquatic resources (11.63 acres [4.71 hectares]) would not be filled. This would reduce the development footprint to about 236 acres (96 hectares), compared to 361 acres (146 hectares) under the Proposed Action. The proposed residential densities under this alternative are greater than the densities included in the Proposed Action. However, due to the reduced footprint of development, the total residential development would be reduced to 1,340 dwelling units, compared to 2,029 units under the Proposed Action. Land designated for commercial uses would be about 23 acres (9 hectares) compared to 43 acres (17 hectares) under the Proposed Action. School acreage would remain the same as under the Proposed Action. Open space acreage would increase from about 36 acres (15 hectares) under the Proposed Action to about 161 acres (65 hectares) under this alternative. The alignments of Mountain Glen Drive, Silver Spruce Drive, and Sierra Trail Drive would be substantially different from the alignments of these roadways under the Proposed Action. This alternative would also include a bridge along a portion of Silver Spruce Drive. As with the Proposed Action and all the other on-site alternatives, no off-site improvements other than the widening of the existing bioswale would be required.

1.7.6 Half Acre Fill Alternative

Under the Half Acre Fill Alternative, areas on the project site containing wetland resources would be preserved as open space such that no more than 0.5 acre (0.2 hectare) of jurisdictional waters would be filled to build the planned community. Based on its design, this alternative would fill about 0.47 acre (0.19 hectare) and preserve 12.08 acres (4.89 hectares) of aquatic resources on the project site.

This alternative would reduce the development footprint to about 223 acres (90 hectares) compared to 361 acres (146 hectares) under the Proposed Action. As with the One Acre Fill Alternative above, the proposed residential densities under this alternative are greater than the densities included in the Proposed Action. However, due to the reduced footprint of development, the total number of residential units would be reduced to 1,256 dwelling units, compared to 2,029 dwelling units under the Proposed Action. Land designated for commercial uses would be about 19 acres (8 hectares) compared to 43 acres (17 hectares) under the Proposed Action. Acreage for school uses would be largely the same as under the Proposed Action. Open space acreage would increase from about 36 acres (15 hectares) under the Proposed Action to about 174 acres (70 hectares) under this alternative. The alignments of Mountain Glen Drive, Silver Spruce Drive, and Sierra Trail Drive would be substantially different from the alignments of these roadways under the Proposed Action. This alternative would also include a bridge along a portion of Silver Spruce Drive. As with the Proposed Action and all the other on-site alternatives, no off-site improvements other than the widening of the existing bioswale would be required.

1.7.7 Off-Site Alternative (Placer Ranch Site)

This is an off-site alternative that would construct the Westbrook project on an approximately 406-acre (164-hectare) portion of the Placer Ranch Specific Plan site located approximately 3.5 miles (5.6 kilometers) to the northwest of the project site within unincorporated Placer County. Under the Off-Site Alternative, approximately 6.2 acres (2.5 hectares) of jurisdictional waters would be filled and 3 acres (1.2 hectares) of aquatic resources on the alternative site would be preserved. An additional 5.72 acres (2.31 hectares) of jurisdictional waters would be filled off-site for a total of 11.92 acres (4.82 hectares) of impact.

The Placer Ranch site is bounded by the Roseville city limit to the south, and is located west of light industrial uses along Industrial Avenue. The alternate site is primarily outside of the 1-mile (1.6-kilometer) County-defined Western Regional Landfill buffer area within which development is restricted to non-residential uses. The total development footprint of 346 acres (140 hectares) would comprise 179 acres (72 hectares) of residential uses (1,560 units at buildout), 35 acres (14 hectares) of commercial and office uses, 45 acres (18 hectares) of industrial uses, 10 acres (4 hectares) of schools, 14 acres (6 hectares) of parks, and 43 acres (17 hectares) of roads. The industrial uses would be located in the southern portion of the site in an area where other land uses cannot be placed due to the presence of a peaking power plant. About 61 acres (25 hectares) would be preserved as open space. Due to its location in an industrial area, this alternative includes a 100-foot (30-meter) buffer along the northern and eastern boundary to separate and buffer the on-site residential uses from the adjacent industrial uses.

A number of off-site utility improvements will be necessary to construct the proposed master planned community at this site. These include two storm drains and storm water detention basins in the area to the west of the alternative site; 24-inch (61-centimeter) and 18-inch (46-centimeter) wastewater lines that would extend off-site to the west and connect to a new 36-inch (91-centimeter) main that would carry wastewater into an existing 48-inch (122-centimeter) main that would convey the wastewater to the Pleasant Grove Wastewater Treatment Plant (PGWWTP). With respect to potable and recycled water, service to the alternative site would be provided via two new 16-inch (41-centimeter) water lines and recycled water lines that would connect to existing water and recycled water lines to the east and south of the alternative site. The entire 2,250-acre (910-hectare) Placer Ranch Specific Plan site has previously been proposed for development of 6,793 residential dwelling units, 527 acres (213 hectares) of business park and light industrial uses, 150 acres (61 hectares) of office uses, 99 acres (40 hectares) of commercial uses, and a 300-acre (121-hectare) branch campus for the California State University, Sacramento. The Placer Ranch Specific Plan project was originally proposed in the County. A development application was submitted to the City of Roseville in 2007, but the project was put on hold. Therefore, this alternative was determined to be a feasible alternative and was evaluated in the Draft EIS. Since the publication of the Draft EIS, in late 2013, the site was purchased by Westpark Communities. Discussions with the City of Roseville and Placer County have been reinitiated regarding development on the site. This new information regarding this alternative site will be considered by the USACE in its alternatives analysis pursuant to Section 404(b)(1) and final decision making with respect to the Proposed Action.

1.8 NEPA REQUIREMENTS FOR RESPONDING TO COMMENTS

NEPA requires the Final EIS to include and respond to all substantive comments received on the Draft EIS (40 CFR § 1503.4). Possible lead agency responses are to:

- modify the proposed action or alternatives
- develop and evaluate new alternatives
- supplement, improve, or modify the substantive environmental analyses
- make factual corrections to the text, tables, or figures contained in the Draft EIS
- explain why no further response is necessary

Additionally, the Final EIS must discuss any responsible opposing view that was not adequately discussed in the Draft EIS and must indicate the lead agency's response to the issue raised 40 CFR § 1502.9(b).

1.8 REQUIREMENTS FOR DOCUMENT CERTIFICATION AND FUTURE STEPS IN PROJECT APPROVAL

The Final EIS is being distributed to agencies, stakeholder organizations, and individuals who commented on the Draft EIS. The Final EIS will be available for public review for 30 days after a notice is published in the Federal Register. Comments shall be sent to:

U.S. Army Corps of Engineers, Sacramento District
Regulatory Division
Attn: Kathy Norton
1325 J Street, Room 1350
Sacramento, California 95814-2922
Fax: (916) 557-7807

Email: DLL-CESPK-RD-EIS-Comments@usace.army.mil

The USACE will circulate the Final EIS for a minimum of 30 days before taking action on the permit applications and issuing its ROD. The ROD will address the decision, alternatives considered, the environmentally superior alternative, relevant factors considered in the decision, and mitigation and monitoring (40 CFR § 1505.2).

1.10 ORGANIZATION AND FORMAT OF THE FINAL EIS

This Final EIS has been organized in the following manner:

- **Chapter 1.0, Introduction** – describes the purpose and content of the Final EIS.
- **Chapter 2.0, Comments on the Draft EIS and Responses to Comments** – contains a list of all agencies and persons who submitted comments on the Draft EIS during the public review period, copies of the comment letters submitted on the Draft EIS, and individual responses to the comments.
- **Chapter 3.0, Errata** – presents corrections and revisions to the text of the Draft EIS based on issues raised by comments, clarifications, corrections, or minor changes to the Proposed Action or alternatives. Changes in the text are shown by ~~strikeouts~~ where text is removed and by <u>underline</u> where text is added.
- **Chapter 4.0, References** – lists the references cited in the above chapters.
- **Chapter 5.0, List of Preparers** – identifies the USACE and consultant staff involved in the preparation of this Final EIS.

1.11 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Table 1.0-1, below presents a summary of the environmental effects of the Proposed Action and alternatives, and for effects determined to be significant, it also presents feasible mitigation measures that would avoid or reduce the significant effects. Significant effects that cannot be reduced to less than significant are indicated in bold. The following lists the acronyms that are used in the table:

NE: No effect

LTS: Less than significant, no mitigation

LTS(m): Less than significant after mitigation

LTS(am): Less than significant, additional mitigation applied

SU: Significant effect, no mitigation feasible

SU(m): Significant residual effect after mitigation

Table 1.0-1
Summary of Impacts and Mitigation Measures

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Aesthetics				
Impact AES-1: Effect on Scenic Vistas **PA, NA, A1 through 5, OSA** No mitigation is feasible.	**SU**	**SU**	**SU**	**SU**
Impact AES-2: Effect on Scenic Resources **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact AES-3: Degradation of Visual Character **PA, NA, A1 through 5, OSA** No mitigation is feasible.	**SU**	**SU**	**SU**	**SU**

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Impact AES-4: Effects from New Sources of Light and Glare	**SU(m)**	**SU(m)**	**SU(m)**	**SU(m)**
Mitigation Measure AES-4a: **Site Lighting to Minimize Nuisance** (***Applicability – Proposed Action and All Alternatives***) *Light-producing uses, such as ball fields, within the SVSP area [i.e., Westbrook project] shall be located and oriented to minimize visual impacts on adjacent residential areas. Lighting shall be shielded and designed to distribute light in the most effective and efficient manner, using the minimum amount of light to achieve the necessary illumination for the use, as defined by suggested lighting standards for competitive play.* **Mitigation Measure AES-4b:** **Use of Low Glare Materials for New Development** (***Applicability – Proposed Action and All Alternatives***) *In order to reduce the effects of daytime glare from development of commercial or office uses within the SVSP area [i.e., Westbrook project], building developers should make use, when feasible, of low-glare materials.* **Timing:** Before approval of building permits for all phases **Enforcement:** City of Roseville Planning and Public Works Departments				
Cumulative Impact AES-1: Effect on Visual Resources **PA, NA, A1 through 5, OSA** No mitigation is feasible.	**SU**	**SU**	**SU**	**SU**

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Agricultural Resources				
Impact AG-1: Conversion of Agricultural Land	LTS(m)	LTS(m)	LTS(m)	LTS(m)
Mitigation Measure AG-1:	**Agricultural Compensation** *(Applicability – No Action, Proposed Action, and All Alternatives)*			
One acre of open space will be preserved within Placer County for each acre of open space impacted within the Specific Plan [i.e., Westbrook project] area. This is to be accomplished through the recordation of conservation easements that result in the formation of preserve lands (each a "mitigation property or "preserve site" and collectively, "mitigation lands" or "preserve lands"). For the purposes of assessing impacts associated with a specific development project, "open space" impacts shall include all land proposed to be developed for urban uses. For purposes of mitigation for the specific development project, the term "open space" shall include any and all undeveloped land proposed to be preserved by conservation easement or otherwise required by any governmental agency to be preserved for any reason, specifically including all lands preserved for habitat or agricultural mitigation as set forth below and lands in agricultural use. No additional agricultural mitigation is required beyond the 1:1 open space requirement noted above, as long as a substantial portion, as determined by the Planning Director, of the mitigation lands acquired are: (1) in agricultural production, (2) are undeveloped and have an NRCS soils classification of the same or greater value than lands being affected within the Specific Plan [i.e., Westbrook project] property at issue, or (3) are undeveloped and have the same or higher value CDC categorization as lands being affected within the Specific Plan [i.e., Westbrook project] property at issue. **Timing:** Before approval of final maps **Enforcement:** City of Roseville Planning Department				

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Impact AG-2: Compatibility with Adjacent Agricultural Uses	LTS(am)	LTS(am)	LTS(am)	LTS(am)
Mitigation Measure AG-2: **Deed Disclosure regarding Agricultural Use** ***(Applicability – No Action, Proposed Action, and All Alternatives)*** *In order to reduce potential conflicts between sensitive uses and agricultural uses, residential units within 100-feet of undeveloped parcels to the west of the SVSP area [i.e., Westbrook project] where agricultural uses exist shall be provided with a deed disclosure or similar notice approved by the City Attorney regarding the proximity and nature of neighboring potential agricultural uses. This disclosure shall be applied at the tentative map state to the affected properties. A written disclosure shall be supplied to the property purchaser or renter by the vendor prior to the completion of the purchase or rental agreement, until such time that the uses are converted to urban development. The text of the disclosure language shall be approved by the City Attorney.* **Timing:** Before approval of final maps **Enforcement:** City of Roseville Planning Department				
Cumulative Impact AG-1: Conversion of Important Farmland **PA, NA, A1 through 5, OSA** Implement **Mitigation Measure AG-1**.	LTS(m)	LTS(m)	LTS(m)	LTS(m)

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Air Quality				
Impact AQ-1: Emissions Associated with Construction	**SU(m)**	**SU(m)**	**SU(m)**	**SU(m)**
Mitigation Measure AQ-1:	**Dust and Construction Control Measures** ***(Applicability – No Action, Proposed Action, and All Alternatives)***			
In accordance with the Placer County Air Pollution Control District (PCAPCD), the Applicant shall comply with all applicable rules and regulations as listed above (e.g., Rule 202, 218 and 228). In addition, prior to the approval of a discretionary permit, the Applicant shall implement the following measures unless superseded by state or other more stringent standards:				
The following mitigation measures shall be implemented to reduce short-term construction-related air quality impacts. In addition, dust control measures are required to be implemented by all projects in accordance with the City of Roseville Grading Ordinance, and the PCAPCD Fugitive Dust Rule 228.				
• *Applicant shall submit to PCAPCD a Construction Emission/Dust Control Plan within 30 days prior to groundbreaking. The Applicant shall provide evidence that a plan was submitted to PCAPCD to the City. If the PCAPCD does not respond within 20 days, the plan shall be considered approved. The plan must address the minimum requirements found in section 300 and 400 of District Rule 228, Fugitive Dust (www.placer.ca.gov/airpollution/airpolut.htm). The Applicant shall keep a hard or electronic copy of Rule 228, Fugitive Dust on site for reference.*				
• *The Construction Emission/Dust Control Plan shall include a comprehensive inventory (i.e., make, model, year, emission rating) of all heavy-duty off-road equipment (50 horsepower (HP) of greater) that will be used an aggregate of 40 or more hours for the construction project. The project representative shall provide PCAPCD with the anticipated construction timeline including start date, and name and phone number of the project manager and on-site foreman. The plan shall demonstrate that the heavy-duty (> 50 HP) off-road vehicles to be used in the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 20 percent NOx reduction and 45 percent particulate reduction compared to the most recent ARB fleet average. PCAPCD shall be contacted for average fleet emission data. Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available. Contractors can access the Sacramento Metropolitan Air Quality Management District's web site to determine if their off-road fleet meets the requirements listed in this measure. (http://www.airquality.org/ceqa/Construction_Mitigation_Calculator.xls)*				
The following measures are also included to reduce construction-related ROG, NOx, PM10, and PM2.5 emissions:				
• *All construction equipment shall be maintained in good operating condition. Contractor shall ensure that all construction equipment is being properly serviced and maintained as per the manufacturer's specifications. Maintenance records shall be available at the construction site for verification. This measure will reduce combustion emissions of all criteria air pollutants.*				

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)

- *Prior to the issuance of any grading permits, the Applicant shall submit construction plans denoting the proposed schedule and projected equipment use. Construction contractors shall provide evidence that low emission mobile construction will be used, or that their use was investigated and found to be infeasible for the project. Low emission equipment is defined as meeting the California Air Resources Board's Tier III standards. Contractors shall also conform to any construction measures imposed by the PCAPCD as well as City Planning Staff. This measure will primarily reduce ROG, NOx, PM10, and PM2.5 exhaust emissions.*
- *Paints and coating shall be applied either by hand or by high volume, low-pressure spray. This measure will reduce evaporative ROG emissions.*
- *All construction shall comply with the following measures to reduce fugitive dust related emissions of PM10 and PM2.5:*
  - *Maintain a minimum 24-inch freeboard on soil haul trucks or cover payloads using tarps or other suitable means.*
  - *Suspend grading operations during high winds (greater than 15 mph).*
  - *Sweep streets as necessary if silt is carried off-site to adjacent public thoroughfares or occurs as a result of hauling.*
  - *Dispose of surplus excavated material in accordance with local ordinances and use sound engineering practices.*
  - *Schedule activities to minimize the amounts of exposed excavated soil during and after the end of work periods.*
  - *Phase grading into smaller areas to prevent the susceptibility of larger areas to erosion over extended periods of time.*
  - *Pave or apply gravel to any on-site haul roads.*
  - *Reestablish ground cover on the construction site through seeding and water.*
  - *Clean earth moving construction equipment with water or sweep clean, once per day, or as necessary (e.g., when moving on-site), consistent with National Pollutant Discharge Elimination System Best Management Practices and the Roseville Grading Ordinance. Water shall be applied to control dust as needed to prevent dust impacts off-site. Operational water truck(s), shall be on-site, as required, to control fugitive dust. Construction vehicles leaving the site shall be cleaned, as needed, to prevent dust, silt, mud, and dirt from being released or tracked off-site.*
  - *Spread soil binders on unpaved roads and employee/equipment parking areas. Soil binders shall be non-toxic in accordance with state and local regulations. Apply approved chemical soil stabilizers, or vegetated mats, etc. according to manufacturers' specifications, to all-inactive construction areas (previously graded areas which remain inactive for 96 hours).*
  - *Minimize diesel idling time to a maximum of 5 minutes.*
  - *Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary diesel power generators, if feasible.*

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)

- *An applicant representative, ARB-certified to perform Visible Emissions Evaluations (VEE), shall routinely (i.e., once per week) evaluate project related off-road and heavy-duty on-road equipment emissions for compliance with this requirement for projects grading more than 20 acres in size, regardless of how many acres are to be disturbed daily.*
- *Construction equipment exhaust emissions shall not exceed the PCAPCD Visible Emissions Rule 202. Fugitive dust is not to exceed 40 percent opacity and not go beyond property boundary at any time. Operators of vehicles and equipment found to exceed opacity limits are to be immediately notified and the equipment must be repaired within 72 hours.*

The City of Roseville is currently working with the Placer County Pollution Control District to update the standard mitigation measures. The following measures will likely be required at the time specific development is proposed.

1a. *Prior to approval of Grading/plans the Applicant shall submit a Construction Emission/Dust Control Plan to the Placer County APCD. The plan must be submitted by certified mail, or receive a date stamp or other submittal proof. This plan must address the minimum Administrative Requirements found in section 300 and 400 of APCD Rule 228, Fugitive Dust. The Applicant shall not break ground prior to receiving APCD approval of the Construction Emission/Dust Control Plan. If the Applicant has submittal proof of submittal and no response is received from the District within 20 working days the plan shall be deemed complete, and construction may begin.*

1b. *Include the following standard note on the Improvement/Grading Plan: The prime contractor shall submit to the District a comprehensive inventory (i.e., make, model, year, emission rating) of all the heavy-duty off-road equipment (50 horsepower of greater) that will be used an aggregate of 40 or more hours for the construction project. If any new equipment is added after submission of the inventory, the prime contractor shall contact the APCD prior to the new equipment being utilized. At least three business days prior to the use of subject heavy-duty off-road equipment, the project representative shall provide the District with the anticipated construction timeline including start date, and name and phone number of the property owner, project manager, and on-site foreman.*

1c. *Prior to approval of Grading/Improvement Plans, the Applicant shall provide a plan to the Placer County APCD for approval by the District demonstrating that the heavy-duty (> 50 horsepower) off-road vehicles to be used in the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 20 percent NOx reduction and 45 percent particulate reduction compared to the most recent CARB fleet average. Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available.*

2. *Include the following standard note on the Improvement/Grading Plan: If required by the Public Works Department, the contractor shall hold a preconstruction meeting prior to grading activities. The contractor shall invite the Placer County APCD to the pre-construction meeting in order to discuss the construction emission/dust control plan with employees and/or contractors.*

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)

3. *Prior to building permit approval, the Applicant shall show, on the plans submitted to the Building Department, that electrical outlets shall be installed on the exterior walls of both the front and back of all residences or all commercial buildings to promote the use of electric landscape maintenance equipment.*
4. *Prior to building permit approval, the Applicant shall show, on the plans submitted to the Building Department, provisions for construction of new residences, and where natural gas is available, the installation of a gas outlet for use with outdoor cooking appliances, such as a gas barbecue or outdoor recreational fire pits.*
5. *Prior to building permit approval, in accordance with District Rule 225, only USEPA Phase II certified wood burning devices shall be allowed in single-family residences. The emission potential from each residence shall not exceed a cumulative total of 7.5 grams per hour for all devices. Masonry fireplaces shall have either an EPA certified Phase II wood burning device or shall be a UL Listed Decorative Gas Appliance. (Rule 225)*
6. *Wood burning or Pellet appliances shall not be permitted in multi-family developments. Only natural gas or propane fired fireplace appliances are permitted. These appliances shall be clearly delineated on the Floor Plans submitted in conjunction with the Building Permit application. (Rule 225/section 302.2)*
7. *Prior to the issuance of a Building Permit, the Applicant shall show that all flat roofs with parapets shall include a white or silver cap sheet to reduce energy demands.*
8. *Diesel trucks shall be prohibited from idling more than 5 minutes. Prior to the issuance of a Building Permit, the Applicant shall show that all truck loading and unloading docks shall be equipped with one 110/208 volt power outlet for every two dock doors. Diesel Trucks idling for more than 5 minutes shall be required to connect to the 110/208 volt power to run any auxiliary equipment. 2-foot x 3-foot signage which indicates "Diesel engine Idling Limited to a Maximum of 5 Minutes" shall be shown on the building elevations and shall be submitted to the Placer County APCD prior to the issuance of Building Permits for the project.*
9. *Prior to approval of Improvement Plans, an enforcement plan shall be established, and submitted to the APCD for review, in order to evaluate project-related on-and-off- road heavy-duty vehicle engine emission opacities on a weekly basis, using standards as defined in California Code of Regulations, Title 13, Sections 2180–2194. An Environmental Coordinator, hired by the prime contractor or property owner, and who is CARB-certified to perform Visible Emissions Evaluations (VEE), shall routinely evaluate project related off-road and heavy duty on-road equipment emissions for compliance with this requirement. Operators of vehicles and equipment found to exceed opacity limits will be notified by APCD and the equipment must be repaired within 72 hours. (California Code of Regulations, Title 13, Sections 2180–2194).*

PCAPCD Rules (Existing District requirements to be added as construction notes or referenced in conditions of approval)

New Standard Condition of Approval (for all projects): *The project shall comply with all applicable Placer County Air Pollution Control District rules and regulations, and shall obtain applicable permits and/or clearances from the District prior to the start of construction.*

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)

The following air quality notes shall be added to the grading and/or improvement plans:

- *The contractor shall use CARB ultra low sulfur diesel fuel for all diesel– powered equipment. In addition, low sulfur fuel shall be utilized for all stationary equipment. (California Standards for Motor Vehicle Diesel Fuel, title 13, article 4.8, chapter 9, California Code of Regulations).*
- *Processes that discharge 2 pounds per day or more of air contaminants, as defined by Health and Safety Code Section 39013, to the atmosphere may require a permit. Permits are required for both construction and operation. Developers/contractors should contact the District prior to construction and obtain any necessary permits prior to the issuance of a Building Permit. (Rule 501)*
- *Pursuant to the Placer County Air Pollution Control District Rule 501, General Permit Requirements, the proposed project may need a permit from the District prior to construction. In general, any engine greater than 50 brake horsepower or any boiler with heat greater than 1,000,000 Btu per hour shall require a permit issued by the District. (Rule 501)*
- *All on-site stationary equipment which is classified as 50 hp or greater shall either obtain a state issued portable equipment permit or a Placer County APCD issued portable equipment permit. (California Portable Equipment Registration Program, Section 2452).*
- *The contractor shall utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary diesel power generators if feasible.*
- *During construction, the contractor shall minimize idling time to a maximum of 5 minutes for all diesel-powered equipment.*
- *During construction, traffic speeds on all unpaved surfaces shall be limited to 15 miles per hour or less. (Rule 228/section 401.2)*

Timing: Before the approval of grading plans and throughout project construction, as appropriate for all project phases.

Enforcement: City of Roseville Public Works and Planning Departments; Placer County Air Pollution Control District

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Impact AQ-2: Criteria Pollutant Emissions Associated with Occupancy/Operation	**SU(m)**	**SU(m)**	**SU(m)**	**SU(m)**

Mitigation Measure AQ-2: **Project Measures to Reduce Operational Emissions**

(*Applicability – No Action, Proposed Action, and All Alternatives*)

Following receipt of an application for a Tentative Maps (excluding the large lot subdivision map), Design Review Permit, conditional use permits and/or all discretionary permits, as found to be in compliance with the 30 percent reduction analysis applicable for individual projects with the Specific Plan [i.e., Westbrook project], the City will forward an early consultation notice to the Placer County Air Pollution Control District (PCAPD). Where the PCAPD provides comments on a specific development proposal, the City shall consult with PCAPD and the developer to incorporate measures recommended by the PCAPD and agreed to by the City into the project. Where the PCAPD does not provide comment on a specific development proposal, the City shall incorporate measures that reduce vehicle emissions and operation emissions from the proposed development. This measure will be implemented through project design, conditions of approval, noticing, and disclosure statements, or through the City's plan check and inspection processes. This process is intended to ensure that best available and practical approaches are used to reduce operational emissions in specific tentative map and design review permit applications. The following is a listing of measures that shall be implemented for the purpose of reducing vehicle and operational emissions.

- *Provide tree plantings that meet or exceed the requirements of the City's Community Design Guidelines to provide shading of buildings and parking lots.*
- *Landscape with native drought-resistant plants (ground covers, shrubs, and trees) with particular consideration of plantings that are not reliant on gas-powered landscape maintenance equipment.*
- *Require all flat roofs on non-residential structures to have a white or silver cap sheet to reduce energy demand.*
- *Provide conductive/inductive electric vehicle charging station and signage prohibiting parking for non-electric vehicles within designated spaces within non-residential developments.*
- *Provide vanpool parking only spaces and preferential parking for carpools to accommodate carpools and vanpools in employment areas (e.g., community commercial, business-professional uses)*
- *All truck loading and unloading docks shall be equipped with one 110/208 volt power outlet for every two-dock doors. Signs shall be posted stating "Diesel trucks are prohibited from idling more than 5 minutes and trucks requiring auxiliary power shall connect to the 110/208-volt outlets to run auxiliary equipment."*
- *Design streets to maximize pedestrian access to transit stops.*

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
• *Require site design to maximize access to transit lines, to accommodate bus travel, and to provide lighted shelters at transit access points.* • *Develop the plan consistent with the higher residential densities (within approved residential density ranges of zone) provided around the village nodes and transit corridors.* • *Include photovoltaic systems in project design and/or participate in Roseville Electric incentive programs for energy-efficient development where feasible.* *Measures for Detached Single-Family Residences:* • *Require electrical outlets be installed on the exterior walls of both the front and back of residences to promote the use of electric landscape maintenance equipment.* • *Require installation of a gas outlet in the rear of residential buildings for use of outdoor cooking appliances, such as gas burning barbeques.* • *Require installation of low nitrogen oxide (NOx) hot water heaters (beyond District Rule 246 requirements)* • *Provide notice to homebuyers of incentive and rebate programs available through Roseville Electric or other providers that encourage the purchase of electric landscape maintenance equipment.* *Prior to approval of Tentative Maps provide notice to homebuyers through CC&Rs or other mechanisms to inform them that only gas fireplaces would be permitted. Where propane or natural gas service is not available, only EPA Phase II certified wood-burning devices shall be allowed in single-family residences. The emission potential from each residence shall not exceed 7.5 grams per hour. Woodburning or Pellet appliances shall not be permitted in multi-family developments.* **Timing:** Before the approval of grading plans and throughout project construction, as appropriate for all project phases. **Enforcement:** City of Roseville Public Works and Planning Departments; Placer County Air Pollution Control District				
Impact AQ-3: CO Hotspots **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Impact AQ-4: Exposure to Toxic Air Contaminants	LTS(m)	LTS(m)	LTS(m)	LTS(m)
Mitigation Measure AQ-4: **Risk Assessment and Site Specific Measures** (***Applicability – No Action, Proposed Action, and All Alternatives***) *Users that could generate toxic air contaminants will be required to submit a Permit to Operate to the PCAPCD. The District will review the use and if a proposed project would cause the combined emissions of TACs to exceed the risk standard of 10 in 1 million at residences or public uses (schools, parks, etc.), additional modeling and/or environmental review would be required to demonstrate emissions from that use or other uses would be reduced so that the standard is not exceeded. For example, an Applicant could propose to retrofit an existing operation in order to lower the total TAC emissions in the SVSP [i.e., Westbrook project] area.* **Timing:** Before the approval of grading plans and throughout project construction, as appropriate for all project phases. **Enforcement:** City of Roseville Public Works and Planning Departments; Placer County Air Pollution Control District				
Impact AQ-5: Exposure to Objectionable Odors **PA, NA, A1 through 5, OSA** No mitigation is required.	NE	NE	NE	NE
Cumulative Impact AQ-1: Effects from Criteria Pollutant Emissions **PA, NA, A1 through 5, OSA** Implement **Mitigation Measure AQ-1**.	**SU(m)**	**SU(m)**	**SU(m)**	**SU(m)**
Biological Resources				
Impact BIO-1: Loss of Wetlands through Direct Removal, Filling, Hydrological Interruption or Other Means **NA** No mitigation is required.	LTS(m)	NE	LTS(m)	LTS(m)

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)

Mitigation Measure BIO-1a: **Restoration and/or Establishment of Wetlands and Other Waters of the U.S.**

(*Applicability – Proposed Action, Alternatives 1 through 5, and Off-Site Alternative*)

Prior to the approval of the Record of Decision for the Proposed Action, in order to mitigate for the unavoidable loss of wetlands and other waters of the U.S., the Applicant shall develop a compensatory mitigation and monitoring plan that will consist of purchase of vernal pool and seasonal wetlands creation/restoration credits, and/or provide permittee-responsible restoration at an off-site location. This plan shall be implemented prior to or concurrent with the occurrence of impacts. The mitigation and monitoring plan shall include plans for the restoration or establishment of aquatic habitat to adequately offset and replace the aquatic functions and services that would be lost within the project area, and contain an adequate margin of safety to reflect anticipated success, as well as identify any off-site locations proposed for compensatory mitigation and/or identify the mitigation bank proposed to be used and the credits of each habitat type proposed to be purchased. Any mitigation bank proposed to be used and shall include the project site within its service area. In addition, in order to reduce cumulative impacts within the area, the Applicant shall attempt to identify and utilize a mitigation bank located within the same watershed as the proposed impacts. The submitted mitigation and monitoring plan shall include the mitigation location and design drawings, vegetation plans, including target species to be planted, and final success criteria, and shall meet the standards of current guidance and regulations (e.g., USACE Sacramento District's "Habitat Mitigation and Monitoring Proposal Guidelines," dated December 30, 2004, USACE regulations at 33 CFR 332, etc.). The compensatory mitigation plan shall ensure no net loss of wetland functions and services of all aquatic resources that would be removed, lost, and/or degraded as a result of implementing the proposed project or any alternative.

Within the Record of Decision for the proposed action, the USACE shall document its determination regarding the appropriate amount and type of restoration or establishment required to ensure no net loss of aquatic resource functions and services, based on a number of factors, including the functions of the resources being impacted, the difficulty of replacing the specific resource, uncertainty and risk of failure, indirect impacts and temporal loss. Any approval of a final mitigation and monitoring plan by the USACE shall include requirements for site protection, the implementation of appropriate financial assurances and monitoring of the creation and/or restoration areas in accordance with applicable regulations and guidance. The use of an approved mitigation bank that includes the project site within its service area would satisfy the mitigation requirements.

Timing: Throughout project construction, as appropriate for all project phases.

Enforcement: U.S. Army Corps of Engineers, Sacramento District

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)

Mitigation Measure BIO-1b: **Preservation of On-Site and Off-Site Wetlands and Other Waters of the U.S.**

(Applicability – Proposed Action, Alternatives 1 through 5, and Off-Site Alternative)

All wetlands and other waters of the U.S. and any vegetated buffers avoided on the project site shall be placed into a separate "preserve" parcel prior to construction activities within waters of the U.S. Prior to the Record of Decision for the proposed action, the Applicant shall develop and submit to the USACE, for review and approval, a specific and detailed preserve management plan for the on-site preservation and avoidance areas. The plan shall describe in detail any activities that are proposed within the preserve areas and the long term funding and maintenance and monitoring of each of the preserve areas. The Applicant shall not construct any roads, utility lines, outfalls, trails, benches, firebreaks or other structure, and shall not conduct any grading, mowing, grazing, planting, discing, pesticide use, burning, or other activities within any on-site or off-site preserve areas without specific, advanced written approval from the USACE. The Applicant shall install temporary fencing around preserved wetlands to avoid inadvertent impacts from ongoing construction near preserved wetlands. No roads, utility lines, outfalls, trails, benches, firebreaks or other structure shall be constructed within the on-site or off-site preserve areas, unless specifically approved by the USACE. Any preserve areas that are located on-site or that are off-site turnkey preservation areas located within the City of Roseville shall be subject to management by the City of Roseville under the City's Open Space Preserve Overarching Management Plan.

Prior to the Record of Decision for the Proposed Action, the Applicant shall develop and submit to the USACE, for review and approval, a specific and detailed preserve management plan for any proposed off-site preservation and on-site avoidance areas. The plan shall describe in detail any activities that are proposed within the preserve areas and the long term funding and maintenance and monitoring of each of the preserve areas.

Within the Record of Decision for the Proposed Action, the USACE shall document its determination on whether any required on-site preservation or any proposed off-site preservation is an appropriate method of compensatory mitigation to offset unavoidable impacts to aquatic resources on the project site. If the USACE determines that preservation of on-site or off-site aquatic resources is appropriate to utilize as compensatory mitigation, the USACE will determine the amount and type of preservation required to ensure no net loss of aquatic resource functions and services, based on a number of factors, including the functions of the resources being impacted, the difficulty of replacing the specific resource, uncertainty and risk of failure, indirect impacts and temporal loss. Any approval of a long-term management plan by the USACE shall include requirements for site protection, the implementation of appropriate financial assurances and monitoring of the preserve areas in accordance with applicable regulations and guidance.

Timing: Before the approval of the Record of Decision and throughout project construction, as appropriate for all project phases.

Enforcement: U.S. Army Corps of Engineers, Sacramento District

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Impact BIO-2: Effects on Listed Vernal Pool Invertebrates and Their Habitat	LTS(m)	**SU(m)**	LTS(m)	LTS(m)
Mitigation Measure BIO-2a: **Secure Take Authorization for Federally Listed Vernal Pool Invertebrates (*Applicability – No Action*)** *No project construction shall proceed in areas supporting potential habitat for federally listed vernal pool invertebrates or within adequate buffer areas (generally 250-feet from habitat) until a biological opinion (BO) and incidental take permit has been issued by the USFWS.* **Timing:** Before the approval of any grading or improvement plans, before any ground-disturbing activities within 250 feet of said habitat, and on an ongoing basis throughout construction as applicable for all project phases. **Enforcement:** U.S. Fish and Wildlife Service; City of Roseville Planning Department **Mitigation Measure BIO-2b:** **Secure Take Authorization for Federally Listed Vernal Pool Invertebrates and Implement Permit Conditions (*Applicability – Proposed Action, Alternatives 1 through 3, and Off-Site Alternative*)** *No project construction shall proceed in areas supporting potential habitat for federally listed vernal pool invertebrates or within adequate buffer areas (generally 250-feet from habitat) until a biological opinion (BO) and incidental take statement has been issued by the USFWS. The USACE will consult with the USFWS under Section 7 of the Endangered Species Act and if the USACE determines DA permits will be issued for impacts to habitat on the project site or alternative site, the BO conditions shall be incorporated into the terms and conditions of the DA permits. The Applicant shall abide by permit conditions (including conservation and minimization measures) intended to be completed before on-site construction.* *The Applicant will not be required to complete this mitigation measure for direct or indirect impacts that have already been mitigated to the satisfaction of USFWS through another BO or mitigation plan.* **Timing:** Before the approval of any grading or improvement plans, before any ground-disturbing activities within 250 feet of said habitat, and on an ongoing basis throughout construction as applicable for all project phases. **Enforcement:** U.S. Army Corps of Engineers, Sacramento District; U.S. Fish and Wildlife Service; City of Roseville Planning Department				

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Impact BIO-3: Effects on Federally Listed Plant Species **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact BIO-4: Effects on Federally Listed Amphibian and Reptile Species **PA, NA, A1 through 5** No mitigation is required.	LTS	LTS	LTS	LTS(m)
Mitigation Measure BIO-4: **Giant Garter Snake Impact Mitigation** ***(Applicability – Off-Site Alternative)*** *No project construction shall proceed in areas containing potential habitat for giant garter snake until a biological opinion (BO) and an incidental take permit has been issued by USFWS. The USACE will consult with the USFWS under Section 7 of the Endangered Species Act and the BO conditions shall be incorporated into the terms and conditions of the DA permit. The Applicant shall abide by permit conditions (including conservation and minimization measures) intended to be completed before construction.* **Timing:** Before the approval of any grading or improvement plans or any ground-disturbing activity within 100 feet of Giant Garter Snake habitat as applicable for all project phases. **Enforcement:** U.S. Fish and Wildlife Service; California Department of Fish and Wildlife; City of Roseville Planning Department upon annexation				

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Impact BIO-5: Effects on Valley Elderberry Longhorn Beetle **PA, NA, A1 through 5** No mitigation is required.	LTS	LTS	LTS	LTS(m)

Mitigation Measure BIO-5: **Valley Elderberry Longhorn Beetle (VELB)**
(Applicability – Off-Site Alternative)

Prior to any ground disturbing or construction activities on the alternative site, the Applicant shall conduct pre-construction surveys of the entire property for the presence of elderberry shrubs and submit the results to the USACE and USFWS for review. For any impacts within 100 feet (30 meters) of an identified elderberry shrub, the Applicant shall consult with the USFWS. The Applicant shall install and maintain a 4-foot-high construction fence around the perimeter of the elderberry shrub. No grading or any other ground disturbing activities shall be conducted within the fenced protected area without prior verification that the requirements of the USFWS have been satisfied, including the issuance of any necessary permits.

The Applicant shall avoid and protect the VELB habitat (elderberry stalks 1 inch in diameter or greater) where feasible. Where avoidance is infeasible, the Applicant shall develop and implement a VELB mitigation plan in accordance with the most current USFWS mitigation guidelines for unavoidable take of VELB habitat pursuant to Section 7 of the Federal Endangered Species Act. The mitigation plan shall include, but might not be limited to, relocation of elderberry shrubs, planting of elderberry shrubs, and monitoring of relocated and planted elderberry shrubs.

Timing: Before the approval of any grading or improvement plans or any ground-disturbing activity within 100 feet of VELB habitat as applicable for all project phases.

Enforcement: U.S. Fish and Wildlife Service; California Department of Fish and Wildlife; City of Roseville Planning Department upon annexation

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Impact BIO-7: Effects on Protected Raptor Species and Other Nesting Birds	LTS(m)	LTS(m)	LTS(m)	LTS(m)

Mitigation Measure BIO-7: **Protection of Nesting Sites**

(Applicability – No Action, Proposed Action, and All Alternatives)[3]

To ensure that fully protected bird and raptor species are not injured or disturbed by construction in the vicinity of nesting habitat, the Applicant shall implement the following measures:

a) If a nest of a legally protected species is located in a tree designated for removal, the removal shall occur between August 30th and February 15th or until the adults and young of the year are no longer dependent on the nest site as determined by a qualified biologist.

b) When feasible, all tree removal shall occur outside the nesting season to avoid the breeding season of any raptor species that could be using the area, and to discourage hawks from nesting in the vicinity of an upcoming construction area.

c) For Swainson's hawk, if avoidance of tree removal outside the breeding season is not feasible, and an active nest is present, the Applicant shall obtain a 2081 permit from CDFW to mitigate for potential "take" under CESA. If no active nesting is occurring, a take permit would not be required.

d) Prior to the beginning of mass grading, including grading for major infrastructure improvements, during the period between February 15th and August 30th, all trees and potential burrowing owl habitat within 350 feet (107 meters) of any grading or earthmoving activity shall be surveyed for active raptor nests or burrows by a qualified biologist no more than 30 days prior to disturbance. If active raptor nests or burrows are found, and the nest or burrow is within 350 feet (107 meters) of potential construction activity, a highly visible temporary fence shall be erected around the tree or burrow(s) at a distance of up to 350 feet (107 meters), depending on the species, from the edge of the canopy to prevent construction disturbance and intrusions on the nest area.

e) Preconstruction and non-breeding season burrowing owl exclusion measures shall be developed in consultation with CDFW, and shall preclude burrowing owl occupation of the portions of the project site subject to disturbance such as grading.

f) No construction vehicles shall be permitted within restricted areas (i.e., raptor protection zones) unless directly related to the management or protection of the legally protected species.

Timing: Before the approval of grading and improvement plans, before any ground-disturbing activities, and during project construction as applicable for all project phases.

Enforcement: U.S. Fish and Wildlife Service; City of Roseville Planning Department; California Department of Fish and Wildlife

3 This measure is substantially the same as Mitigation Measure 4.8-3 in the Sierra Vista Specific Plan EIR and was adopted by the City of Roseville at the time of project approval and will be enforced by the City.

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Impact BIO-8: Effects on State Special-Status Bats **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact BIO-9: Effects on Wildlife Movement **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact BIO-10: Loss of Riparian Habitat **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS(m)
Mitigation Measure BIO-10: **Mitigation for Riparian Habitat Impact** ***(Applicability – Off-site Alternative)*** *In compliance with Section 1602 of the Fish and Game Code, the Applicant will enter into a Streambed Alteration Agreement which will require that any riparian habitat disturbed during construction of the sewer line will be restored and revegetated.* **Timing:** Before the approval of grading and improvement plans, and during construction of sewer improvements. **Enforcement:** California Department of Fish and Wildlife; City of Roseville Planning Department				
Impact BIO-11: Effects on On-Site Fish Species **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact BIO-12: Effects on Fish Habitat from Water Diversions **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Cumulative Impact BIO-1: Loss of Aquatic Resources **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS(am)	LTS	LTS(am)	LTS(am)
Cumulative Impact BIO-2: Loss of Vernal Pool Grassland Habitat **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS(m)	LTS(m)	LTS(m)	LTS(m)
Cumulative Impact BIO-3: Effects on Wildlife Foraging and Movement Habitat **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS(m)	LTS(m)	LTS(m)	LTS(m)
Climate Change				
Impact GHG-1: GHG Emissions due to Construction **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS(am)	LTS(am)	LTS(am)	LTS(am)

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Impact GHG-2: GHG Emissions due to Operation/Occupancy	**SU(m)**	**SU(m)**	**SU(m)**	**SU(m)**

Mitigation Measure GHG-2a: **Air Quality Measures**

(Applicability – No Action, Proposed Action, and All Alternatives)

Implement Air Quality Mitigation Measure 4.4-1, listed in Section 4.4 Air Quality (Sierra Vista EIR), which would reduce operational and construction-related emissions of criteria air pollutants and precursors, and would also act to reduce GHG emissions associated with project construction and operation. Mitigation Measure 4.4-1 is relevant because both criteria air pollutant and GHG emissions are frequently associated with combustion byproducts. Certain measures are already components of the project (i.e., Specific Plan policies, design guidelines, and standards) and/or would be applied consistent with the City's General Plan Policies, addressing GHG emissions and climate change, but are provided here for purposes of completeness.

Mitigation Measure GHG-2b: **Additional Measures to Reduce GHG Emissions**

(Applicability – No Action, Proposed Action, and All Alternatives)

Each increment of new development within the project site requiring a discretionary approval (e.g., proposed tentative subdivision map, conditional use permit), shall demonstrate that GHG emissions from project construction and operation will be reduced by 30 percent from business-as- usual emissions levels projected for 2025.

For each increment of new development, the City shall submit to the developer, a list of potentially feasible GHG reduction measures to be considered in the construction and design of that portion of the project. The City's list of potentially feasible GHG reduction measures shall reflect the then-current state of the regulation of GHG emissions and climate change, which is expected to continue to evolve under the mandate of AB 32. The developer shall then submit to the City a mitigation plan that lists the measures selected to be implemented as part of the project and contains an analysis demonstrating the associated reduction in GHG emissions. The report shall also demonstrate why measures not selected are considered infeasible. The City shall review the mitigation report for the applicable increment of development and approve the report (with modifications, if considered necessary and feasible) prior to granting any requested discretionary approval for that increment of development. In determining what sort of measures should appropriately be imposed by a local government under the circumstances, the City shall consider the following factors:

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)

- *The extent to which rates of GHG emissions generated by motor vehicles traveling to, from, and within the project site are projected to decrease over time as a result of regulations, policies, and/or plans that have already been adopted or may be adopted in the future by the Air Resources Board (ARB) or other public agency pursuant to AB 32, or by EPA;*
- *The extent to which mobile-source GHG emissions, which at the time of writing this EIR comprise a substantial portion of the state's GHG inventory, can also be reduced through design measures that result in trip reductions and reductions in trip length;*
- *The extent to which GHG emissions emitted by the mix of power generation operated by Roseville Electric, that will serve the project site, are projected to decrease pursuant to the Renewable Portfolio Standard required by SB 1078 and SB 107, as well as any future regulations, policies, and/or plans adopted by the federal and state governments that reduce GHG emissions from power generation;*
- *The extent to which replacement of CCR Title 24 with the California Green Building Standards Code or other similar requirements will result in new buildings being more energy efficient and consequently more GHG efficient;*
- *The extent to which any stationary sources of GHG emissions that would be operated on a proposed land use (e.g., industrial) are already subject to regulations, policies, and/or plans that reduce GHG emissions, particularly any future regulations that will be developed as part of ARB's implementation of AB 32, or other pertinent regulations on stationary sources that have the indirect effect of reducing GHG emissions;*
- *The extent to which the feasibility of existing GHG reduction technologies may change in the future, and to which innovation in GHG reduction technologies will continue, affecting cost-benefit analyses that determine economic feasibility; and*
- *Whether the total costs of proposed mitigation for GHG emissions, together with other mitigation measures, required for the proposed development, are so great that a reasonably prudent property owner would not proceed with the project in the face of such costs.*

In considering how much, and what kind of, mitigation is necessary in light of these factors, the City shall consider the following list of options, though the list is not intended to be exhaustive, as GHG reduction strategies and their respective feasibility are likely to evolve over time. These measures are derived from multiple sources including the Mitigation Measure Summary in Appendix B of the California Air Pollution Control Officer's Association (CAPCOA) white paper, CEQA & Climate Change (CAPCOA 2008), and the California Attorney General's Office (2008).

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)

Energy Efficiency

- *Include clean alternative energy features to promote energy self-sufficiency (e.g., photovoltaic cells, solar thermal electricity systems, small wind turbines).*
- *Design buildings to meet CEC Tier II requirements (e.g., exceeding the requirements of the Title 24 (as of 2007) by 35 percent).*
- *Site buildings to take advantage of shade and prevailing winds and design landscaping and sun screens to reduce energy use.*
- *Install efficient lighting in all buildings (including residential). Also install lighting control systems, where practical. Use daylight as an integral part of lighting systems in all buildings.*
- *Install light-colored "cool" pavements, and strategically located shade trees along all bicycle and pedestrian routes.*

SVSP [i.e., Westbrook project] developers shall be encouraged incorporate "green building" points into the construction and design of all (additions of 25,000 square feet of office/retail commercial or 100,000 square feet of industrial floor area) projects that incorporate "green building" points in construction. Such points may be achieved through checklists identified by New Home Construction Green Building Guidelines available at www.builditgreen.org, or through a similar list that distinguishes specific measures targeting efficiencies in energy, resource use, or other measures that would also directly or indirectly result in GHG emission reductions. Specific efficiencies that would reduce GHG emissions shall be implemented where feasible, for all project areas including site design, landscaping, foundation, structural frame and building envelope, exterior finishing, plumbing, appliance use, insulation, heating, venting and air conditioning, building performance, use of renewable energy, finishes, and flooring.

SVSP [i.e., Westbrook project] developers shall be encouraged to incorporate any combination of the following strategies to reduce heat gain for 50 percent of the non-roof impervious site landscape (including roads, sidewalks, courtyards, parking lots, and driveways) into the construction and design of all new (additions of 25,000 square feet of office/retail commercial) projects:

- *Shaded (Within five years of occupancy)*
- *Paving materials with a Solar Reflective Index (SRI) of at least 29*
- *Open grid pavement system (pavement that is less than 50 percent impervious and contains vegetation in the open cells)*
- *Parking spaces under cover (defined as underground, under deck, under roof, or under building.) Any roof used to shade or cover parking should have an SRI of at least 29.*
- *Optional level of LEED certification, such as silver or gold which can allow for further reductions in energy consumption and GHG emissions.*

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)

Water Conservation and Efficiency

The SVSP project [i.e., Westbrook project] includes water conservation as part of the project. In addition, the following should be considered:

- *With the exception of ornamental shade trees, use water-efficient landscapes with native, drought-resistant species in all public area and commercial landscaping. Use water-efficient turf in parks and other turf dependent spaces.*
- *Install the infrastructure to use recycled water for landscape irrigation (part of the project).*
- *Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls. (Water Efficient Landscaping Ordinance)*
- *Design buildings and lots to be water-efficient. Only install water-efficient fixtures and appliances (e.g., Ultra low-flow toilets, no flow urinals etc.).*
- *Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff. Prohibit businesses from using pressure washers for cleaning driveways, parking lots, sidewalks, and street surfaces unless required to mitigate health and safety concerns. These restrictions should be included in the Covenants, Conditions, and Restrictions of the community.*

Solid Waste Measures

- *Reuse and recycle construction and demolition waste (including, but not limited to soil, vegetation, concrete, lumber, metal, and cardboard).*
- *Provide interior and exterior storage areas for recyclables and green waste at all buildings.*
- *Provide adequate recycling containers in public areas, including parks, school grounds, paseos, and pedestrian zones in areas of mixed-use development.*
- *Provide education and publicity about reducing waste and available recycling services.*

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Transportation and Motor Vehicles • *Promote ride sharing programs and employment centers (e.g., by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading zones and waiting areas for ride share vehicles, and providing a web site or message board for coordinating ride sharing).* • *Provide the necessary facilities and infrastructure in all land use types to encourage the use of low or zero emission vehicles (e.g., electric vehicle charging facilities and conveniently located alternative fueling stations).* • *At commercial land uses, all forklifts, "yard trucks," or vehicles that are predominately used on-site at non-residential land uses shall be electric-powered or powered by biofuels (such as biodiesel [B100]) that are produced from waste products, or shall use other technologies that do not rely on direct fossil fuel consumption.* • *Implement roundabouts. (30 percent intersection emissions reduction)* • *Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles (e.g., electric vehicle charging facilities and conveniently located alternative fueling stations) (0.5 to 1.5 percent emissions reduction).* • *Prioritized parking within new commercial and retail areas shall be given to electric vehicles, hybrid vehicles, and alternative fuel vehicles.* • *Incorporate bicycle lanes, routes, and intersection improvements into street systems within the Specific Plan [i.e., Westbrook project] (1 percent emissions reduction).* • *For commercial land uses, provide adequate bicycle parking near building entrances to promote cyclist safety, security, and convenience (1 percent emissions reduction).* • *Create Class II bicycle lanes and walking paths directed to the location of schools, parks and other destination points (1 percent emissions reduction).* • *Encourage the public school districts to serve the project site with a student busing system, and/or enable students residing in the project to safely walk to or bicycle to school without encountering barriers such as large arterial roadways or sound walls.* • *Construction of transit facility/amenity (bus shelters, bicycle lockers/racks, etc.) for existing public and private transit (0.5 percent emissions reduction).* • *Provide secure bicycle storage at public parking facilities.* **Timing:** Before the approval of all grading plans and construction, throughout project construction, and during project operation, where applicable. **Enforcement:** City of Roseville Planning Department				
Cultural Resources				
Impact CR-1: Potential to Damage Undiscovered Historic Properties or Human Remains during Construction	LTS(m)	LTS(m)	LTS(m)	LTS(m)

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)

Mitigation Measure CR-1a: **Discovery of Cultural Resources during Construction**

(Applicability –Proposed Action and All Alternatives)

Should any cultural resources, such as structural features, any amount of bone or shell, artifacts, human remains, or architectural remains, be encountered during any subsurface development activities, work shall be suspended within 100 feet (30 feet) of the find. The City of Roseville Planning and Public Works staff and the USACE staff shall be immediately notified. At that time, the City of Roseville and the USACE shall coordinate any necessary investigation of the site with qualified archaeologists as needed, to assess the resource (i.e., whether it is a historical resource, a unique archaeological resource, or a historic property) and provide proper management recommendations should potential impacts to the resources be found to be significant or adverse. Possible management recommendations for important resources could include resource avoidance or, where avoidance is infeasible in light of project design or layout to avoid significant (adverse) effects, data recovery excavations. The contractor shall implement any measures deemed feasible and necessary by the City and USACE staff, in consultation with the archaeologists and California State Historic Preservation Officer, as appropriate, to avoid or minimize significant (adverse) effects to the cultural resources. In addition, pursuant to Section 5097.98 or the State Public Resources Code, and Section 7050.5 of the State Health and Safety Code, in the event of the discovery of human remains, the County Coroner shall be immediately notified. If the remains are determined to be Native American, guidelines of the Native American Heritage Commission shall be adhered to in the treatment and disposition of the remains.

Mitigation Measure CR-1b: **Evaluation of Historic Resources for Eligibility and Appropriate Processing Under Section 106**

(*Applicability – Off-Site Alternative*)

The USACE shall satisfy the requirements of Section 106 of the NHPA for the Off-Site Alternative by preparing a Programmatic Agreement (PA) which requires the following measures:

- *For each development phase of the specific plan and associated Federal permits and authorizations, the USACE, as the Federal Section 106 lead (or the USACE designee) shall prepare an APE map and shall consult with the SHPO on the APE.*
- *Once the SHPO, the USACE, and other consulting parties agree on the project-specific APE, the USACE or permit Applicant (or designee, as directed by the USACE) shall perform an inventory of cultural resources in the phase-specific APE consistent with the Secretary of the Interior's Standards and Guidelines for Identification (48 Federal Register [FR] 44720-23) and submit this inventory to the SHPO and any other relevant consulting parties for review as required under the PA. The same document shall evaluate identified resources for listing on the NRHP per NRHP criteria and the Secretary of the Interior's Standards and Guidelines for Evaluation (48 FR 44723-26).*

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
• *Once the inventory is complete, the USACE shall prepare a Determination of Effect to assess the effect of the buildout of the individual development phase upon identified historic properties by applying the Criteria of Adverse Effect pursuant to 36 CFR 800.5(a) (1). If the USACE identifies adverse effects, the project Applicant shall prepare treatment measures and protocols to minimize these impacts to the extent feasible. These treatment measures shall be appended to the PA in a treatment plan prepared for the specific project development phase. Treatment measures may include, but are not limited to, avoidance and preservation in places, where feasible. Where avoidance is not feasible, treatment shall consist of either: (1) recovery of a suitable sample of material from archaeological sites that have the potential to contribute to research, and/or (2) documentation of historic resources to capture their significance and relationship to important historical themes, complexes, or landscape setting. Documentation of historical resources shall be performed according to the Historic American Building Survey or Historic American Engineering Record (HABS/HAER) specifications or an equivalent standard when existing architecture or engineered features are subject to adverse effects. Where appropriate, treatment plans may specify the preparation and circulation of interpretive brochures, narrative descriptions, and photographic documentation for the general public.* **Timing:** Before the approval of all grading plans and construction, and throughout project construction. **Enforcement:** City of Roseville Planning Department				
Cumulative Impact CR-1: Damage to Historic Properties or Human Remains **PA, NA, A1 through 5, OSA** Implement **Mitigation Measure CR-1**.	LTS(m)	LTS(m)	LTS(m)	LTS(m)
Environmental Justice				
Impact EJ-1: Disproportionate Adverse Environmental Effects on Minority or Low-income Populations **PA, NA, A1 through 5, OSA** No mitigation is required.	NE	NE	NE	NE
Impact EJ-2: Effect Related to Substantial Population Growth **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Geology, Soils, and Minerals				
Impact GEO-1: Hazard associated with Seismic Ground-shaking **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact GEO-2: Hazard associated with Liquefaction **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact GEO-3: Hazard associated with Slope Failure **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact GEO-4: Potential Structural Damage due to Expansive Soils **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact GEO-5: Effect on Mineral Resources **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Hazards and Hazardous Materials				
Impact HAZ-1: Exposure to Soil or Groundwater Contamination from Past Uses	LTS(m)	LTS(m)	LTS(m)	LTS(m)
Mitigation Measure HAZ-1: **Soil and Groundwater Contamination** ***(Applicability –Proposed Action and All Alternatives)*** *Prior to site development in the SVSP, recommended testing and remediation, if needed shall occur. Groundwater wells shall be properly closed.* *If evidence of soil contamination, septic tanks, or other underground storage tanks are encountered in previously unidentified locations in the SVSP area, work shall cease until the area can be tested, and if necessary remediated and/or properly removed or closed. Remediation activities could include removal of contaminated soil and/or on-site treatment. As part of the process, the City shall ensure that any necessary investigation and/or remediation activities are coordinated with the Roseville Fire Department, Placer County Division of Environmental Health, and if needed, other appropriate federal, state, and local agencies. Once a site is remediated, construction can continue.* **Timing:** During project construction. **Enforcement:** City of Roseville Planning Department				
Impact HAZ-2: Hazards from Accidental Release of Hazardous Materials or Wastes **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact HAZ-3: Risk related to Use of Recycled Water **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Hydrology and Water Quality				
Impact HYDRO-1: Effect related to On- or Off-Site Flood Hazards	LTS(m)	LTS(m)	LTS(m)	LTS(m)
Mitigation Measure HYDRO-1: **Payment of Drainage Impact Fees** ***(Applicability – No Action, Proposed Action, and All Alternatives)*** *The City shall collect the Pleasant Grove Drainage Fee from the Applicant prior to the approval of each building permit, which would cover the cost of retention for that development's portion of the Roseville regional retention basin at Reason Farms.* **Timing:** Before the approval of each building permit. **Enforcement:** City of Roseville Planning Department				
Impact HYDRO-2: Effects from Construction within a Floodplain **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact HYDRO-3: Exposure to Flood Hazards related to Dam or Levee Failure **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact HYDRO-4: Water Quality Effects during Construction **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Impact HYDRO-5: Water Quality Effects from Project Occupancy and Operation	LTS(m)	LTS(m)	LTS(m)	LTS(m)
Mitigation Measure HYDRO-5: **Stormwater Management Standards** ***(Applicability – No Action, Proposed Action, and All Alternatives)*** *At the tentative map or site development stage, development shall be conditioned to include source control and treatment control measures to include LID strategies and BMP treatment as required by the City's then current design standards and the City's then current General Phase II NPDES Permit issued by the state. The measures would include, but are not limited to the measures identified above, and in Table IV.B.2 Applicable LID Measures by Development Type, found in the Sierra Vista Drainage and Stormwater Master Plan found in Appendix O of the Sierra Vista Specific Plan EIR prepared by the City of Roseville.* **Timing:** Before approval of grading plans and building permits for all project phases. **Enforcement:** City of Roseville Planning Department				
Impact HYDRO-6: Effect of Tertiary Treated Effluent on Pleasant Grove Creek **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact HYDRO-7: Effect on Groundwater Recharge **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact HYDRO-8: Effects on Groundwater Basin **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Cumulative Impact HYDRO-1: Flooding, Water Quality, and Groundwater **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Land Use and Planning				
Impact LU-1: Result in Incompatible Land Uses **PA, NA, A1 through 5, OSA** Implement **Mitigation Measure AG-2**.	LTS(am)	LTS(am)	LTS(am)	LTS(am)
Impact LU-2: Physically Divide an Established Community **PA, NA, A1 through 5, OSA** No mitigation is required.	NE	NE	NE	NE
Impact LU-3: Conflict with General Plan and Zoning Code **PA, NA, A1 through 5, OSA** No mitigation is required.	NE	NE	NE	NE
Impact LU-4: Conflict with SACOG Blueprint **PA, NA, A1 through 3, OSA** No mitigation is required.	LTS	LTS	LTS	LTS

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Noise				
Impact NOISE-1: Construction Noise and Vibration	**SU(m)**	**SU(m)**	**SU(m)**	**SU(m)**
Mitigation Measure NOISE-1:	**Construction Noise Policies** (***Applicability – No Action, Proposed Action, and All Alternatives***)			

- *Construction activities shall comply with the requirements of the City of Roseville Noise Ordinance.*
- *Locate fixed construction equipment such as compressors and generators as far as possible from sensitive receptors. Shroud or shield all impact tools, and muffle or shield all intake and exhaust ports on power construction equipment.*
- *Designate a construction disturbance coordinator and conspicuously post the Coordinator's contact information around the project site and in adjacent public spaces. The disturbance coordinator will receive all public complaints about construction noise disturbances, and will be responsible for determining the cause of the complaint, and implementing any feasible measures to be taken to alleviate the problem.*
- *Well drilling shall occur prior to construction of the adjacent subdivision, to the extent feasible. If construction timing for the wells occurs after subdivision construction, then measures to reduce noise shall include hanging flexible sound control curtains around the drilling apparatus, and the drill rig, to the degree feasible, as determined by the City, if located within 1,000 feet (305 kilometers) of an occupied residence.*

Timing: During all phases of project construction.

Enforcement: City of Roseville Planning Department

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Impact NOISE-2: Noise from On-Site Activities	LTS(m)	LTS(m)	LTS(m)	LTS(m)
Mitigation Measure NOISE-2:	**Commercial Noise Controls** (***Applicability – No Action, Proposed Action, and All Alternatives***)			
For commercial uses within 150 feet (46 meters) of residential uses, the applicants shall implement the following or equally effective measures: • *In general, where commercial land uses adjoin residential property lines, the following measures should be included in the design of the commercial use. If the primary noise sources are parking lots, HVAC equipment and light truck deliveries, then 6- to 7-foot-tall masonry walls shall be constructed to provide adequate isolation of parking lot and delivery truck activities. HVAC equipment shall be located either at ground level, or when located on rooftops the building facades shall include parapets for shielding.* • *Where commercial uses adjoin common residential property lines, and loading docks or truck circulation routes face the residential areas, the following mitigation measures shall be included in the project design:* – *Loading docks and truck delivery areas shall maintain a minimum distance of 30 feet from residential property lines.* – *Property line barriers shall be 6 to 8 feet (1.8 to 2.4 meters) in height. Circulation routes for trucks shall be located a minimum of 30 feet (9 meters) from residential property lines.* – *All heating, cooling, and ventilation equipment shall be located within mechanical rooms where possible.* – *All heating, cooling, and ventilation equipment shall be shielded from view with solid barriers.* – *Emergency generators shall comply with the local noise criteria at the nearest noise-sensitive receivers.* – *In cases where loading docks or truck delivery circulation routes are located less than 100 feet (30 meters) from residential property lines, an acoustical evaluation shall be submitted to verify compliance with the City of Roseville Noise Level Performance Standards.* **Timing:** During design review and before the approval of all plans, where applicable for all project phases. **Enforcement:** City of Roseville Planning Department				
Impact NOISE-3: Increase in Traffic Noise at Buildout (Year 2025) *On-site sensitive receptors*	LTS(m)	LTS(m)	LTS(m)	LTS(m)

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Mitigation Measure NOISE-3: Traffic Noise Attenuation (***Applicability – No Action, Proposed Action, and All Alternatives***) • *Masonry walls and/or landscaped berms shall be constructed along the major project-area roadways adjacent to proposed residential uses if acoustical studies warrant sound attenuation, otherwise standard wood fencing is acceptable. Table 4.6-10 data from the Sierra Vista Specific Plan EIR prepared by the City of Roseville shall be consulted to determine appropriate barrier heights. If the assumptions shown in Table 4.6-10 vary considerably, a detailed analysis of exterior and interior mitigation measures should be conducted when tentative maps become available.* • *In areas requiring sound attenuation, noise barrier walls shall be constructed of concrete panels, concrete masonry units, earthen berms, or any combination of these materials. Wood is not recommended for construction due to eventual warping and degradation of acoustical performance.* **Timing:** During design review and before the approval of all plans, where applicable for all project phases. **Enforcement:** City of Roseville Planning Department				
Impact NOISE-3: Increase in Traffic Noise at Buildout (Year 2025) *Off-site sensitive receptors* **PA, NA, A1 through 5, OSA** No mitigation is feasible.	**SU**	**SU**	**SU**	**SU**
Impact NOISE-4: Aviation Noise **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Cumulative Impact NOISE-1: Construction and Operational Noise Effects **PA, NA, A1 through 5, OSA** Implement **Mitigation Measure NOISE-3**.	LTS(m)	LTS(m)	LTS(m)	LTS(m)

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Public Services				
Impact PUB-1: Demand for Law Enforcement Services **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact PUB-2: Demand for Fire Protection Services **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact PUB-3: Demand for School Facilities **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact PUB-4: Demand for Library Services **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Transportation and Traffic				
Impact TRA-1: Increased Traffic at City of Roseville Intersections	**SU(m)**	**SU(m)**	**SU(m)**	**SU(m)**
Mitigation Measure TRA-1:	**Pay fair share of the improvements to City of Roseville intersections (*Applicability – No Action, Proposed Action, and All Alternatives*)**			

Pay Fair Share of Improvements in the CIP including improvements to the following intersections:

- *Fiddyment/Baseline Road: improve intersection as part of the project*
- *Watt Avenue/Baseline Road: improve intersection as part of the project*
- *Baseline Road: widen to four-lane facility from Fiddyment Road to western Specific Plan Boundary.*

Improvements would be necessary to the following intersections, as part of the project to achieve acceptable service levels under the 2025 CIP plus Project scenario. However, as noted, many intersections cannot be mitigated because of constraints.

1. *Foothills Boulevard and Baseline Road: No feasible mitigation*
2. *Industrial Avenue and Alantown Drive: No feasible mitigation*
3. *Cirby Way and Northridge Drive: No feasible mitigation*
4. *Foothills Boulevard and Junction Boulevard: No feasible mitigation*
5. *Junction Boulevard and Baseline Road: No feasible mitigation*
6. *Roseville Parkway and Sierra College Boulevard: No feasible mitigation*
7. *Blue Oaks Boulevard and Crocker Ranch Road: Re-stripe to include two south bound to east bound left turn lanes and a separate right turn. This improvement will be added to the City of Roseville's Capital Improvement program. Development within the Westbrook project area will be required to pay fair share costs for this improvement*
8. *Blue Oaks Boulevard and New Meadow Drive: Re-stripe the southbound through lane to a shared through and left-turn lane. This improvement will be added to the City of Roseville's Capital Improvement program. Development within the Westbrook project area will be required to pay fair share costs for this improvement. As such, this impact would be reduced to less than significant.*
9. *Foothills Boulevard and Baseline/Main: No feasible mitigation*
10. *Sunrise Boulevard and Sandringham/Kensington: add a dedicated southbound right-turn lane*
11. *Woodcreek Oaks and Baseline Road: construction of a second eastbound through lane. This improvement is currently in the City's CIP program. Westbrook would be required to pay fair share costs for this improvement.*

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
The Westbrook project will develop over a period of years. Therefore, the impacts on these intersections would occur over a period of time. As with other improvements in the 2025 CIP, the City will monitor traffic conditions and determine when specific improvements are needed. The City of Roseville's traffic impact fees should be revised to include the Westbrook project area. Specific Plans and/or development proposals shall provide for fair share contributions of the cost of the improvements through the updated traffic impact fees. *Construction of intersection improvements could have impacts on biological and cultural resources, air quality, water quality, and noise levels. These impacts will be evaluated as part of the CIP update to incorporate the adopted mitigation.* **Timing:** Before approval of the first subdivision map. **Enforcement:** City of Roseville Public Works Department				
Impact TRA-2: Increased Traffic at Placer County Intersections and Roadway Segments **PA, NA, A1 through 5** No mitigation is required.	LTS	LTS	LTS	**SU(m)**
Mitigation Measure TRA-2:	**Pay fair share of the cost of Improvements to the Segment of Sunset Boulevard west of Industrial Avenue *(Applicability – Off-Site Alternative)*** *The proposed development will pay its fair share of the cost of necessary improvements to the segment of Sunset Boulevard west of Industrial Avenue by participating in the City/County Joint Fee Program to fund this improvement.* **Timing:** Before approval of the first subdivision map. **Enforcement:** Placer County; City of Roseville Public Works Department			
Impact TRA-3: Increased Traffic at Sacramento County Intersections and Roadway Segments **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Impact TRA-4: Increased Traffic at Sutter County Intersections and Roadway Segments **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact TRA-5: Increased Traffic along City of Rocklin Roadway Segments **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact TRA-6: Increased Traffic at State Highway Intersections and Segments	**SU(m)**	**SU(m)**	**SU(m)**	**SU(m)**
Mitigation Measure TRA-6: **Pay fair share of the cost of improvements to State Highway Segments** ***(Applicability – No Action, Proposed Action, and All Alternatives)*** *No specific improvements have been identified to mitigate project impacts on I-80, SR 70/99, or SR 65; however, the City is willing to work with Caltrans to establish a regional approach to institute a fee program for the purpose of funding improvements on these facilities. If and when Caltrans and the City enter into an enforceable agreement, the Project shall pay impact fees to the City of Roseville in amounts that constitute the Project's fair share contributions to the construction of transportation facilities and/or improvements, consistent with the Mitigation Fee Act (Gov. Code, § 66000 et seq.).* *The City shall determine the means of providing the project's fair share of the funds for these improvements to Caltrans through the inter-agency agreement or other arrangement required by Mitigation Measure 4.3-5 in the Sierra Vista Specific Plan EIR prepared by the City of Roseville.* **Timing:** Before approval of the first subdivision map. **Enforcement:** Caltrans; City of Roseville Public Works Department				
Impact TRA-7: Increased Demand for Local Transit Service **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Impact TRA-8: Increased Demand for Local Bicycle Facilities **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Utilities and Service Systems				
Impact UTIL-1: Availability of Water Supplies to Meet Demand **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact UTIL-2: Groundwater Demand Impacts **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS
Impact UTIL-3: Capacity of Water Treatment and Supply Facilities **PA, NA, A1 through 5, OSA** No mitigation is required.	LTS	LTS	LTS	LTS

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Impact UTIL-4: Impacts from Construction or Expansion of Wastewater Facilities	LTS(m)	LTS(m)	LTS(m)	LTS(m)

Mitigation Measure UTIL-4: **WWTP Capacity**

(Applicability – No Action, Proposed Action, and All Alternatives)

Prior to obtaining building permits in the SVSP [i.e., Westbrook project], the Applicant shall demonstrate to the City that the South Placer Wastewater Authority has approved expansion of the South Placer Wastewater Authority service area boundary to include the SVSP [i.e., Westbrook project] area. The Applicant shall participate financially through connection fees in the construction of additional wastewater treatment capacity sufficient to accommodate projected flows. Applicant shall also participate on a fair share basis in other financial mechanisms for any additional environmental review required to secure approvals necessary to increase wastewater discharges from the plant, including approval by the South Placer Wastewater Authority for expansion of the service area boundary. It is recognized that Applicant will rely on the City (on behalf of the South Placer Wastewater Authority partners) to construct regional treatment and regional transmission facilities needed to discharge treated wastewater flows from within the service area boundary. In the event the City is unable to obtain the appropriate permits (e.g., NPDES permit) or is unable to complete the required facility expansions, development within the service area boundary may continue until existing capacity has been exhausted, at which time any remaining development will be curtailed until such time that sufficient treatment and discharge capacity becomes available. Further, Applicant and/or the City, as appropriate, shall implement all relevant construction-related mitigation measures for expansion of the plant listed in Appendix H of the Sierra Vista Specific Plan EIR prepared by the City of Roseville and all water quality and aquatic resource mitigation measures applicable to this project as listed in Table 4.12.3-5 of the Sierra Vista Specific Plan EIR.

Timing: Before approval of final maps and issuance of building permits for any project phases.

Enforcement: City of Roseville Environmental Utilities Department

Resource Topic/Impact	Proposed Action (PA)	No Action (NA)	Alternatives 1 through 5 (A1 through 5)	Off-Site Alternative (OSA)
Impact UTIL-5: Increased Demand for Solid Waste Services	**SU(m)**	**SU(m)**	**SU(m)**	**SU(m)**
Mitigation Measure UTIL-5:	**Expand the Regional Landfill** ***(Applicability – No Action, Proposed Action, and All Alternatives)***			
Development in the SVSP Area and Urban Reserve [i.e., Westbrook project] shall pay collection fees to the City of Roseville, a portion of which shall be used to service bonds necessary to fund landfill expansion. As a member of the WPWMA, the City of Roseville can support the expansion of the landfill, as needed; however, the City cannot compel the WPWMA to expand the landfill. **Timing:** Before approval of final maps and issuance of building permits for any project phases. **Enforcement:** City of Roseville Environmental Utilities Department				
Impact UTIL-6: Increased Demand for Electricity, Natural Gas, and Telecommunications	LTS	LTS	LTS	LTS
PA, NA, A1 through 5, OSA No mitigation is required.				
Cumulative Impact UTIL-1: Effect on Water Supply	**SU**	**SU**	**SU**	**SU**
PA, NA, A1 through 5, OSA No mitigation is feasible.				

2.0 COMMENTS ON THE DRAFT EIS AND RESPONSES TO COMMENTS

2.1 INDEX TO COMMENTS

As described in **Section 1.0, Introduction**, the U.S. Army Corps of Engineers (USACE) received comments from agencies, organizations, and members of the public on the Draft Environmental Impact Statement (Draft EIS). All comments on the Draft EIS received from the public and agencies have been numbered, and the numbers assigned to each comment are indicated on the written communications that follow. All entities who commented on the Draft EIS are listed in **Table 2.0-1, Index to Comments,** below.

Table 2.0-1
Index to Comments

Comment Letter	Letter Date	Agency/Individuals
Federal Agencies		
A	July 11, 2013	U.S. Environmental Protection Agency, Jeff Scott
Organizations		
B	July 12, 2013	Westpark Communities, Jeff Jones

2.2 RESPONSES TO INDIVIDUAL COMMENTS

This chapter contains the comment letters received on the May 2013 Draft EIS for the Westbrook project. Following each comment letter are responses to individual comments.

Letter A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

July 11, 2013

Kathy Norton
U.S. Army Corps of Engineers, Sacramento District
1325 J Street, Room 1350
Sacramento, California 95814

Subject: Draft Environmental Impact Statement for the Westbrook Project, Placer County, California (CEQ# 20130138)

Dear Ms. Norton:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Westbrook Project pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. We appreciate efforts by the U.S. Army Corps of Engineers (Corps) to coordinate with our agency throughout the environmental review process.

The Westbrook Project was previously part of the Sierra Vista Specific Plan (SVSP). In 2008, the previous owner of the Westbrook property stopped pursuing the application for a Corps permit, and the remainder of the SVSP site continued through the environmental review process without the Westbrook property. The Westbrook property was part of the SVSP when the Corps issued Public Notice (PN) 200601050 on March 28, 2008. EPA's April 28 and May 12, 2008 letters in response to the PN for SVSP initiated the 404(q) elevation process due to concerns over potential impacts to Aquatic Resources of National Importance (ARNI). We note that, as presently proposed, the split of the development plan has not resulted in any reduction of proposed impacts to ARNI, nor has the value of the resource changed since 2008; therefore, EPA's ARNI designation for the original SVSP site, including Westbrook, remains and applies to both the Sierra Vista and Westbrook Projects. EPA's February 22, 2013 comments on the Administrative DEIS for the Westbrook Project again raised objections to impacts to Waters of the U.S. (WUS), as well as the proposed project's potential inability to comply with the 404(b)(1) Guidelines and achieve adequate mitigation. 1

The Proposed Action Alternative would establish a 35.8-acre open space area in the northwestern corner of the site. It would also, however, eliminate 76 percent (9.56 of the 12.55 acres) of onsite WUS. While vernal pools and other seasonal wetlands on the site have been disturbed by past agricultural activities, they continue to be important parts of the landscape and cannot easily be replaced. Based on information EPA has reviewed to date, the Clean Water Act Section 404 Permit Applicant (Applicant) has not demonstrated compliance with the 404(b)(1) Guidelines, which require the Corps to permit only the Least Environmentally Damaging Practicable Alternative (LEDPA). The Applicant has also not demonstrated that unavoidable impacts to WUS would be fully mitigated if the Proposed Action is implemented. 2

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We have rated the DEIS as Environmental Objections – Insufficient Information (EO-2) (see enclosed EPA Rating Definitions) based on (1) impacts to Waters of the U.S., (2) the potential for the Proposed Action Alternative to be selected for implementation when it does not appear to be the LEDPA, and (3) the potential inability of the Proposed Action Alternative to achieve no net loss of wetland functions. Please find our detailed comments attached, which provide recommendations to address these issues as well as our concerns with: (1) stormwater and flooding risk, (2) impacts to air quality, (3) transportation, and (6) opportunities to create a more environmentally sustainable project. 3

We acknowledge that the DEIS addresses some of EPA's comments on the Administrative DEIS by providing: (1) further explanation of the need for the project, (2) assessment of how the project aligns with the regional Sustainable Communities Strategy, and (3) clarification of mitigation measures. The DEIS also includes information EPA requested on cumulative air impacts from other reasonably foreseeable projects within the Sacramento Valley Air Basin. The disclosure of quantitative measures of cumulative air impacts (to the degree that information is available) enables a better understanding of long term health impacts, and facilitates stronger mitigation planning. Given the many planned development projects in the region, mitigation will be a challenge, and we encourage coordination with the Placer County Air Pollution Control District on this matter. 4

We appreciate the opportunity to review this DEIS, and are available to discuss our comments. If you have any questions, please contact Jen Blonn, the lead reviewer for this project. Ms. Blonn can be reached at 415-972-3855 or blonn.jennifer@epa.gov.

Sincerely,

for

Jeff Scott, Director
Waste Management Division and
Communities and Ecosystems Division

Enclosures:
Summary of the EPA Rating System
EPA Detailed Comments

Cc via email:
Mike McKeever, Sacramento Area Council of Government

U.S. EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE WESTBROOK PROJECT, PLACER COUNTY, CALIFORNIA, JULY 11, 2013

Waters of the U.S. (WUS)

Compliance with the 404(b)(1) Guidelines

Page 29 of the Corps South Pacific Division (SPD) February 8, 2013 Regulatory Program Standard Operating Procedure for Preparing and Coordinating EISs (12509-SPD) states:

> Districts will make all reasonable efforts to ensure the NEPA alternatives analysis is thorough and robust enough to provide the information needed for the evaluation of alternatives under the section 404(b)(1) Guidelines ("Guidelines") and the public interest review. The goal of integrating the NEPA alternatives analysis and the section 404(b)(1) alternatives analysis is to gain efficiencies, facilitate agency decision-making and avoid unnecessary duplication.

The discussion of alternatives in the FEIS does not provide the information needed for the evaluation of alternatives under section 404(b)(1). The Proposed Action Alternative would fill 76 percent (9.56 of the 12.55 acres) of onsite WUS, which includes filling 0.86 of 1.81 acres of onsite vernal pools. The Proposed Action Alternative appears to impact substantially more acres of WUS than would other alternatives. For example, Alternatives 1 and 2 would fill 3.08 onsite acres; Alternative 3 would fill 5.03 onsite acres; Alternative 4 would fill 0.92 onsite acres; Alternative 5 would fill 0.47 onsite acres. The DEIS does not demonstrate that WUS have been avoided to the greatest reasonable extent, nor does it indicate that relatively less impactful alternatives are not *practicable*, as defined by the Clean Water Act Section 404(b)(1) Guidelines (Guidelines). For further coordination on issues pertaining to WUS, please contact Eric Raffini, EPA Wetlands Office, at (415) 972-3544 or Raffini.eric@epa.gov.

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> **Recommendation for the Final Environmental Impact Statement (FEIS):**
> Include a 404(b)(1) Alternatives Analysis in order to demonstrate that the project is avoiding and minimizing damage to WUS to the maximum extent practicable and is in compliance with the Guidelines. EPA is available to assist the Corps and the Section 404 Permit Applicant (Applicant) in determining compliance with the Guidelines.

Habitat Preservation

The project site is located within the Western Placer County (Zone 2) core recovery area of the Southeast Sacramento Valley vernal pool region. Core recovery areas are identified by the U.S. Fish and Wildlife Service (FWS) to focus recovery actions for species of animals and plants that are listed as either Endangered or Threatened. Statewide losses of vernal pools currently exceed 85 percent of the historic distribution, and tens of thousands of acres of land supporting vernal pools and related ecosystems are threatened by numerous proposed developments in western Placer County and adjacent counties. Protection of Zone 2 areas "will significantly contribute to the recovery of species" (page 3.4-38), which heightens the importance of avoiding and minimizing impacts to WUS, mitigating for all impacts within the watershed, and mitigating for vernal pool impacts within the core recovery area.

6

> **Recommendation for the FEIS:**
> Ensure that any potential mitigation for vernal pools is located within the Western Placer County core area of the Southeast Sacramento vernal pool region.

1

Placer County Conservation Plan (PCCP)

The proposed project is located within the geographic area covered by the draft PCCP (pages 3.0-5 and 3.0-13). EPA strongly supports the development of the PCCP. Since the PCCP is not approved, we agree with the Corps' decision to evaluate the proposed development in the context of a stand-alone project. Based on information in the DEIS, it is unclear whether development in the project area aligns with the PCCP, and whether the Applicant might participate in the PCCP if it is approved, thereby potentially changing the mitigation strategy. We believe that the best mitigation would come about as the result of the project fulfilling its compensation and preservation requirements under the auspices of an approved PCCP, if the opportunity becomes available. 7

Recommendation for the FEIS:

Discuss whether the proposed project is consistent with the land use designations under the draft PCCP, whether the Applicant may participate in the PCCP if it is approved, and how potential participation in the PCCP could alter project-specific mitigation plans.

Compensatory Mitigation Plan

Appendix 3.4 contains the Applicant's conceptual compensatory mitigation plan. The plan outlines the Applicant's strategy to compensate for impacts to WUS by constructing and preserving wetlands onsite and through the purchase of credits off-site at an approved mitigation bank. In addition, Appendix 3.4 explains that, in lieu of purchasing credits at a bank, "...the Applicant wishes to maintain the option to develop a permittee-sponsored mitigation plan..." (page 2); EPA is unable to evaluate this option because details are not provided. We recognize that Mitigation Measures BIO-1a and BIO-1b indicate that details on mitigation, including final ratios and locations, will be reached prior to the Record of Decision. We believe, however, that the DEIS should have documented the availability of appropriate mitigation for this project and provided more details on a mitigation strategy that would comply with the applicable regulations.

8

The approach to mitigation proposed for Westbrook Project closely mirrors the proposal for the adjacent Sierra Vista Project (Corps DA # SPK-2006-01050). In EPA's September 4, 2012 comment letter on the Sierra Vista DEIS, we emphasized that features that primarily manage stormwater should not be counted as compensation for wetlands. The Westbrook mitigation plan, however, proposes constructing 3.88 acres of riverine wetlands on low terraces adjacent to the two intermittent streams on the north portion of the property. These wetlands "are designed to be inundated during frequent storm events" and will accommodate post-development flows from the surrounding developments. EPA considers these to be "treatment" wetlands, which have a stormwater management and water quality polishing function. While constructed treatment wetlands provide a good approach to stormwater management, we do not believe that they are appropriate compensation for the loss of depressional and slope wetlands such as vernal pools, seasonal wetlands, and seasonal swales. EPA requests the opportunity to discuss the role of stormwater control wetlands in the compensatory mitigation plan with the Corps. Please contact Eric Raffini, EPA Wetlands Office, at (415) 972-3544 or Raffini.eric@epa.gov.

Recommendations for the FEIS:

- Provide more detailed information on where and how the Applicant would meet mitigation requirements. Include details on proposed ratios and types of mitigation. Ensure that mitigation ratios are consistent with the Corps South Pacific Division's Standard Operating Procedures for establishing mitigation ratios.
- Commit to avoid introducing any untreated or unpolished stormwater into any wetlands for which onsite compensatory mitigation credits would be issued.
- Ensure that permittee-sponsored mitigation is only allowed if it would (1) support a watershed approach to aquatic resource management (such as contributing to existing regional conservation plans), and (2) "restore an outstanding resource based on a rigorous scientific and technical analysis" (40 CFR 230.93(b)(2)). Otherwise, we recommend that the purchase of approved credits for the types of wetlands that would be lost be the preferred approach to mitigation for this project. 8
- Revise Table 3.4-21 so that it includes a column for total mitigation without preservation. The current total mitigation column is misleading because it includes preservation acres, which primarily fulfill requirements from FWS Biological Opinions under Section 7 of the Endangered Species Act, and are not mitigation for impacts to WUS.

Stormwater & Downstream Flood Risk

Mitigation Measure HYDRO-1 addresses downstream flooding effects by requiring the Applicant to pay a fair-share contribution toward the cost of the Reason Farms flood control project (page 3.10-17). Timing of the Reason Farms flood control project is uncertain; the project could be constructed in 10 years (page 3.10-3). While there appears to be ample retention capacity for the Westbrook Project, it is unclear how many other projects are also relying on the Reason Farm flood control system to mitigate stormwater runoff and flood risks.

Recommendations for the FEIS: 9

- Ensure that the Westbrook Project does not rely on the Reason Farms Project for mitigation before the flood control system is operational. If the Westbrook Project schedule could move ahead of the Reason Farms Project schedule, identify an alternative measure to control downstream flooding.
- In the cumulative impacts analysis (page 3.10-35), list other projects that are also relying on Reason Farms to mitigate stormwater runoff and flood risk, and include a comparison of planned use and capacity.
- Discuss the feasibility of using permeable pavements for roadways as a means to further reduce stormwater runoff, protect water quality, and minimize flood risk.

Air Quality

EPA is concerned with air quality impacts from this project, particularly when considered in concert with the numerous other development and major infrastructure projects proposed or in process within the region. The DEIS explains that, "The Proposed Action and all alternatives are included in current growth forecasts for the Roseville area but were not included in growth forecasts used in preparation of the most recent State Implementation Plan (SIP). Therefore, unmitigated emissions associated with operation and occupancy of the Proposed Action and all alternatives and build-out of cumulative development would directly adversely affect the 10

region's ability to achieve compliance with air quality standards" (page ES-6). In order to achieve attainment, strong measures are needed to avoid, minimize, and mitigate impacts.

Thank you for including tables with criteria pollutant emission estimates from construction and operational phases of other major infrastructure projects in the region. Such information helps clarify the intensity of cumulative impacts, as well as future challenges the region would face in attaining federal air quality standards.

Recommendations for the FEIS:

- Please coordinate with the Placer County Air Pollution Control District to ensure that construction and operational emissions from this project, combined with other reasonably foreseeable projects nearby, will not exceed the relevant emission budgets in the SIPs, and document this coordination in the FEIS. 10
- Include the following projects in Tables 3.3-9, 3.3-10, 3.3-14 and 3.3-15, or explain why they are excluded: Mather Specific Plan, Southport Sacramento River Early Implementation Project, Jackson Township Project, and Folsom Dam Modification Project Approach Channel.
- Clarify whether Tables 3.3-9, 3.3-10, 3.3-14 and 3.3-15 contain emission estimates before or after mitigation.
- Discuss potential differences between lower density and higher density alternatives with respect to long-term regional cumulative air quality impacts from the operational period. The potential benefits of "smart growth" do not appear to be fully described.
- Update pages 3.3-6 and 3.3-40 so that they correctly list Placer County's unclassified attainment status for PM10.

Transportation

Creating an entirely new development provides ample opportunities to incorporate policies and designs that minimize traffic impacts and create a high-quality living environment, with easy access to jobs, services, and recreation. Proactive early collaboration between the City, County, Applicant, transit agencies, and the Sacramento Area Council of Governments (SACOG) to integrate transit, such as a bus rapid transit system, into the overall site design appears to be an additional opportunity that could significantly lower long term emissions from the project.

All alternatives would have significant effects on traffic after mitigation (page 3.14-32), and transportation would account for over 80 percent of operational greenhouse gas (GHG) emissions for the proposed project (43,015 of 52,744 tons of CO2e; page 3.5-18). Mitigation Measure GHG2b requires consideration of several elements, including "construction of transit facility/amenity…for existing public and private transit" (page 3.5-25). A strong commitment to *new* transit to serve the proposed development area does not appear to be included. Several traffic mitigation measures require the Applicant to pay a "fair share" towards the cost of intersection and roadway construction; however, no similar measure is proposed to support transit system planning and development. 11

Recommendations for the FEIS:

- Coordinate with the City, County, Applicant, transit agencies, and SACOG on the feasibility of incorporating a robust new transit plan as a component of the project.

Assess the benefits of including development of transit routes early in the neighborhood design process in order to maximize ridership and efficiently incorporate transit facilities into streetscapes. Document coordination in the FEIS, and include relevant commitments.

- Consider an additional mitigation measure under which the Applicant would pay a "fair share" for transit system planning and development as a means to mitigate significant impacts on traffic, criteria air pollutants, and GHGs. Coordinate with the City and County on the feasibility of such a measure, and document coordination in the FEIS. 11
- Consider using a grid pattern for neighborhood roadways to reduce the travel distance for vehicles, bikes, and pedestrians for local trips. Grid patterns can make more trips possible to complete without use of a vehicle.

Sustainable Transportation & Building

Green building incorporates strategies to reduce energy and water needs, minimize harmful chemicals, and create a healthy indoor environment, among other goals. Green building strategies can also reduce operation and maintenance costs for owners and ease public service (i.e. water and electricity) demand requirements for the project. The U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) program offers detailed guidance, and EPA is available to assist the Applicant in identifying appropriate opportunities.

Recommendations for the FEIS:

- Discuss the feasibility and benefits of obtaining LEED for Neighborhood Development (ND) Certification for the project area or a portion of it. LEED-ND certification provides independent, third-party verification that a neighborhood development project is located and designed to meet high levels of environmentally responsible, sustainable development, with principles that are in line with the Sacramento Region Blueprint's growth principles. 12
- Discuss the feasibility and benefits of obtaining LEED certification for homes, schools, and commercial buildings.
- Discuss the feasibility and benefits of exceeding CALGreen standards in priority areas by meeting "optional" standards, including: pollutant control, indoor air quality, renewable energy, energy and water conservation, and low impact development.
- Consider recycled materials that could be used to replace raw materials for particular infrastructure components. Some options include tire-derived aggregate, crushed recycled concrete, recycled asphalt pavement, and rubberized asphalt concrete.
- Consider establishing a policy to use locally sourced materials to reduce air emissions from transport.

Letter A: U.S. Environmental Protection Agency, Jeff Scott, Director, dated July 11, 2013

Response A-1

The U.S. Environmental Protection Agency (USEPA) summarizes the history of the Proposed Action and indicates that similar to the Sierra Vista Specific Plan area of which the project site was formally a part, the project site is designated an Aquatic Resource of National Importance (ARNI). The comment is noted.

Response A-2

The USEPA's comment that the Proposed Action does not appear to be the least environmentally damaging practical alternative (LEDPA) and concern about the adequacy of the mitigation put forth by the Applicant is noted. The Applicant has prepared and submitted a Section 404(b)(1) Alternatives Analysis to meet the Applicant's obligation of proving that the Proposed Action is the LEDPA. The U.S. Army Corps of Engineers (USACE) will review the Applicant's Section 404(b) Alternatives Analysis as well as conduct its own analysis of the Proposed Action and the EIS alternatives using the criteria for practicability under Clean Water Act (CWA) Section 404, and will identify the LEDPA in the USACE's Section 404(b)(1) analysis and its Record of Decision (ROD). The USACE has evaluated the draft mitigation plan put forth by the Applicant using the Standard Operating Procedure (SOP) for Determination of Mitigation Ratios (12501-SPD), and the Applicant has revised and prepared a final mitigation plan that incorporates the ratios provided by the USACE.

Response A-3

The USEPA's comment regarding the rating of the Draft EIS is noted. The USEPA also identifies concerns regarding the Proposed Action and its environmental impacts on the waters of the United States, stormwater and flooding risk, air quality transportation and other issues. The same issues are raised in greater detail in the detailed comments attached to its comment letter. Detailed responses to the issues raised by the USEPA are presented in **Responses A-5** through **A-12**, below.

Response A-4

The comment is noted.

Response A-5

The Draft EIS includes a range of on-site alternatives that are a series of development scenarios that have progressively reduced impacts to aquatic resources. As stated in the Draft EIS, all six on-site alternatives are considered feasible under the National Environmental Policy Act (NEPA) and have been carried forward for detailed evaluation in the EIS; however, these alternatives have not yet been evaluated to determine whether they are practicable or not. The Applicant has prepared and submitted a Section 404(b)(1) Alternatives Analysis to meet the applicant's obligation of proving that the Proposed Action is the LEDPA. The USACE will review the Applicant's Section 404(b)(1) alternatives analysis as well as conduct its own analysis of the Proposed Action and the EIS alternatives using the criteria for practicability under CWA Section 404, and will identify the LEDPA in the USACE's 404(b)(1) analysis and its ROD.

Concerning the USEPA's offer to assist in determining compliance with the Clean Water Act Section 404(b)(1) Guidelines, the USACE is committed to working with the USEPA consistent with the provisions of the 1992 Memorandum of Agreement (MOA) Establishing Procedures to implement Section 404(q) of the CWA between the USEPA and USACE.

Response A-6

The Applicant proposes to purchase 22.62 acres of vernal pool preservation credits from the Laguna Terrace East Conservation Bank, and 0.873 acre of constructed vernal pool restoration credits from the Toad Hill Ranch Mitigation Bank. Both of these are located within the Western Placer County (Zone 2) core recovery area of the Southeast Sacramento Valley Vernal Pool Region.

Response A-7

As shown in Figure 1-1, Regional Location of the PCCP Area, in the Draft Placer County Conservation Plan (PCCP), the Westbrook project site is located outside of the area covered by the PCCP. Therefore, PCCP land use designations do not apply to the Proposed Action. However, the Proposed Action is consistent with the goals and policies of the PCCP, and would complement the plan by providing additional avoidance and preservation opportunities.

The PCCP is still in the planning stage and not approved. While the Applicant would be free to participate in the PCCP if it is adopted within the timeframe of the Proposed Action and its mitigation obligations, based on the project schedule and the current status of the PCCP, it appears unlikely that the Applicant would provide compensatory mitigation for the Proposed Action's impacts under the auspices of the PCCP.

Response A-8

The original mitigation proposal for the Westbrook project involved both on-site and in-kind mitigation. The USEPA objected to that proposal and recommended purchase of mitigation credits from an approved mitigation bank. The Applicant has revised the proposed compensatory wetland mitigation plan to eliminate any on-site restoration or creation of wetlands and to eliminate any excavation within the upland portions of the on-site open space preserve for floodplain expansion. As no compensatory mitigation for filling of wetlands will be provided on-site, no compensatory wetlands will be used for the treatment of stormwater runoff. All restoration and creation mitigation will be accomplished through the purchase of credits from approved mitigation banks within their approved service areas. The USACE used the procedures laid out in the Standard Operating Procedure for Determination of Mitigation Ratios (12501-SPD) to determine the appropriate mitigation ratios depending on type of wetlands that would be impacted, which bank the credits would be purchased from, and what type of credits would be purchased. The Applicant's final mitigation plan incorporated the ratios provided by the USACE and the mitigation now complies with the SOP (see summary below).

Mitigation Plan

All restoration and creation mitigation will be accomplished through the purchase of credits from approved mitigation banks within their approved service areas.

As stated in the Draft EIS, the proposed project would directly impact 9.61 acres of waters of the U.S., of which 0.873 acre is vernal pools, 0.624 acre is depressional seasonal wetlands, and 8.104 acres are swale wetlands. The Applicant proposes to compensate for impacts to waters of the U.S. through a combination of preservation of wetlands on-site, purchase of vernal pool, riparian and emergent marsh complex, and/or seasonal wetland restoration/creation credits from approved mitigation banks and purchase of vernal pool preservation credits from an approved mitigation bank.

The Applicant proposes the establishment of a 35.8-acre wetland preserve in the northwest corner of the project area. This wetland preserve is contiguous with much larger wetland preserves located to the north and east on the West Roseville Specific Plan development. Approximately 2.983 acres of wetlands will be preserved and managed in this area. This total is composed of 0.946 acre of intermittent channel, 0.952 acre of vernal pools, 0.725 acre of seasonal wetlands and 0.359 acre of wetland swales. The Applicant further proposes to provide 22.62 acres of vernal pool preservation credits, 0.873 acre of vernal pool restoration credits and up to 16.831 acres of riparian and freshwater marsh complex and/or seasonal wetland creation credits from an approved mitigation bank.

The Applicant proposes to mitigate the 0.873 acre of direct impacts to vernal pools by purchasing 0.873 acre of constructed vernal pool restoration credits from the Toad Hill Mitigation Bank, a 1:1 mitigation ratio. The Applicant proposes to mitigate 0.624 acre of direct impacts to seasonal wetlands either by purchasing constructed riparian and freshwater marsh complex creation credits from the Sacramento River Ranch Wetlands Mitigation Bank at a 1:1 ratio and/or by purchasing constructed seasonal wetland mitigation credits from the Toad Hill Wetlands Mitigation Bank at a 1:1 ratio. The Applicant proposes to mitigate 8.104 acres of direct impacts to wetland swales either by purchasing constructed riparian and freshwater marsh complex creation credits from the Sacramento River Ranch Wetlands Mitigation Bank at a 2:1 ratio and/or by purchasing constructed seasonal wetland mitigation credits from the Toad Hill Wetlands Mitigation Bank at a 1:1 ratio.

The Toad Hill Mitigation Bank is located within the Western Placer County Core Vernal Pool Recovery Area. The purchase of constructed seasonal wetland credits from the Toad Hill Mitigation Bank is preferred over purchase of constructed riparian and freshwater marsh complex credits from the Sacramento River Ranch Wetlands Mitigation Bank. The number of credits ultimately purchased from either bank will depend on the number of credits available at the Toad Hill Mitigation Bank at the time the mitigation must be implemented.

The Applicant proposes to secure 22.62 acres of vernal pool preservation credits from an approved conservation bank within the bank's approved Service area. The credits would be obtained from the Laguna Terrace Conservation Bank.

Revisions

The changes to Table 3.4-21 are shown in **Chapter 3.0, Errata**. The revised final Mitigation Plan is included in **Appendix A** of this Final EIS.

Response A-9

The volumetric increase in storm water generated by the Westbrook project on a standalone basis is insignificant. Therefore if a portion of or all of the Westbrook project were to be developed in advance of the construction of the Reason Farms Retention Project with no other new development in the rest of the City, it would not add a substantial volume of water to downstream locations where flooding occurs.

However, the Westbrook project will build out over a period of years as will other areas within the City and the flows combined would be substantial enough to seriously exacerbate downstream flooding in the sump area upstream from the Natomas Cross Canal–Pleasant Grove Canal confluence. To address this cumulative effect, the Reason Farm Retention Project has been planned by the City. The Reason Farms Project will accommodate flood flows from the Westbrook project and the City of Roseville's currently entitled and future developments as well as projects in growth areas identified in the City/Placer County memorandum of understanding (MOU)[1] (City of Roseville 2002). The mitigation for stormwater retention that the City of Roseville requires is the payment of fees for the Reason Farms Retention Project. The City has made significant progress with the Reason Farms Project through the purchase of the property and annexation into the City.

Permeable pavements and other Low Impact Development (LID) measures such as disconnected roof drains, vegetated filter strips and bioswales, soil amendments, and impervious pavement reductions are considered beneficial for stormwater quality and will slow down and reduce stormwater flows and provide infiltration opportunities. Per the City of Roseville requirements, these LID measures have been incorporated into the Westbrook Project to achieve volumetric reduction (see pages 3.10-26 and 3.10-27 in the Westbrook Draft EIS).

Response A-10

The USEPA expresses concern about the Proposed Action's cumulative effects on air quality, given the fact that a substantial amount of new development is anticipated in the air basin, and recommends that strong measures are needed to avoid, minimize and mitigate air quality impacts. The USEPA also lists a number of items that it recommends be included in the Final EIS. The USEPA's concern about cumulative air quality impacts is noted. The USACE's responses to the specific items listed for inclusion in the Final EIS are presented below.

The USACE has conducted a General Conformity analysis of the Proposed Action's construction emissions and determined that the Proposed Action's construction emissions over which the USACE has jurisdiction are below de minimis levels for the pollutants for which the air basin is in nonattainment. Given this finding, the USACE is not required to coordinate with the local air district. Furthermore, numerous mitigation measures have been imposed on the construction and operation phases of the Proposed Action (and alternatives) to avoid, minimize, and mitigate air pollutant emissions.

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1 The City/Placer County MOU recognizes growth potential, the right of the City to accept development applications, mitigation expected, and a coordination process between the two jurisdictions. The MOU came out of a 1997 Settlement Agreement where the City was concerned about urban development on the City borders that would have potential impacts on city services.

As noted on page 3.3-36, the study area for cumulative air quality impacts is the Sacramento Valley Air Basin (SVAB) which encompasses nine counties in full and portions of Placer and Solano counties. A list-based approach is generally useful only when considering localized cumulative impacts on sensitive receptors from concurrent construction on two or more nearby projects. However for evaluating cumulative air quality impacts within an air basin that covers a very large area encompassing 11 counties, a list-based approach is not reasonable because no matter how well the list is assembled, it will fail to capture all potential future sources of emissions in the air basin. It is for this reason that the local air districts do not advocate a list-based analysis of a project's cumulative air quality impacts. Instead, the air districts, including the Placer County Air Pollution Control District, recommend a mass emissions-based analysis of each project's contribution to the cumulative air quality in the air basin in their California Environmental Quality Act (CEQA) Guidelines. However, for all projects in the vicinity of the Proposed Action for which data were available, estimated emissions were reported in the Draft EIS. Data for three of the four projects that the USEPA requested be included, have been added to the relevant tables as shown in **Chapter 3.0, Errata**. Emissions data for one project (Jackson Township Project) were not available.

The data in Tables 3.3-9, 3.3-10, 3.3-14, and 3.3-15 present mitigated criteria air pollutant emissions if available and unmitigated in the cases when mitigated emissions were not available.

Additional information highlighting the differences between the low density and higher density alternatives in terms of long-term operational air emissions has been added to Cumulative Impact AQ-1. The added text is shown in **Chapter 3.0, Errata**.

The federal attainment for respirable particulate matter (PM10) in Placer County has been updated to indicate the "unclassified" status as shown in Table 3.3-2 in **Chapter 3.0, Errata**.

Response A-11

The City of Roseville (City) has an existing transit system that has grown over the years as new development has come on line. The Draft EIS, on page 3-13, generally describes the City's system and that of Placer County:

> **"City of Roseville Transit Services**
>
> Roseville Commuter Service is a fixed-route scheduled transit system operated by the City of Roseville. It provides weekday commute period service between Roseville and downtown Sacramento. Roseville Transit is a fixed-route scheduled transit system operated by the City of Roseville within the City limits. There are currently nine scheduled routes. There are five transfer points: Sierra Gardens, Galleria Mall, City Hall, Auburn/Whyte, and Woodcreek Oaks/Junction. Many of the Roseville Transit riders are elderly and disabled. The Roseville Transit system connects to both Placer County Transit (at Galleria Mall and Auburn/Whyte) and Sacramento Regional Transit (at Auburn/Whyte).

Placer County Transit Services

Placer County Transit is a fixed-route scheduled transit system operated by Placer County that principally serves the I-80, Highway 49, and SR 65 corridors. Placer County Transit has an Auburn-to-Light Rail express route that stops at the Auburn/Whyte transfer point and connects to Sacramento Regional Transit there before proceeding to the Watt/I-80 light rail station. Placer County Transit also has a Lincoln to Galleria to Sierra College route.

Other Transit Services

Greyhound Bus Lines, Amtrak, and Capital Corridor Intercity Rail are other bus and rail transit services that are available in the Roseville area."

The City's Final Environmental Impact Report for the Sierra Vista Specific Plan (SVSP) (on page 4.3-35) provides additional information on the subject of the City's commitment to public transit:

"Long Range Transit Master Plan

The City has worked with the Placer County Transportation Planning Agency (PCTPA) and surrounding jurisdictions to develop the Transit Master Plan for South Placer County, which is a long range transit plan document, intended to guide the growth of transit services within the City of Roseville and the surrounding jurisdictions in Placer County through the planning horizon of 2030-2040. The PCTPA Board adopted the plan and a guide template for services outlined as Scenario 2. Scenario 2 of the Transit Master Plan highlighted increased services and a new bus rapid transit program in response to anticipated development.

Short Range Transit Plan

The SRTP is a state and federally mandated planning document that describes the plans, programs and goals of the transit operator. The SRTP was last adopted in 2005 and it has a 7-year planning horizon. The SRTP focuses on the characteristics of the existing system and addresses operational, capital and financial needs for future transit services during the 7-year planning horizon. The SRTP was last amended in June 2009 to add a bus rehabilitation and remanufacturing project to program federal stimulus funds to improve the existing transit fleet."

Although, as the Draft EIS also notes (on page 3-13), "[t]here are currently no Roseville Transit routes directly serving the project site," the City has already taken the steps necessary to link its existing transit system to both the SVSP generally and the Westbrook area specifically. This commitment is reflected in the SVSP as amended, as well as other City documents, and anticipated future City actions will translate the commitment into reality as the landowners obtain more focused land use entitlements. Thus, there would be no need for additional actions by the USACE to encourage or facilitate transit usage even if the USACE, under the CWA or NEPA, had the legal authority to take such actions.

Section 6.4 of the SVSP reads, in pertinent part, as follows:

> "Public transit, another transportation choice supported in the SVSP, may include a combination of bus service systems via Roseville Transit with connections to Sacramento Regional Transit and Placer County Transit. These services will utilize Sierra Vista's roadway systems to provide local and regional transit connections for community residents. Roseville Transit provides fixed route and Dial-A-Ride services within the City, as well as fixed route commuter services between Roseville and downtown Sacramento. The fixed route local and commuter systems operate on regularly scheduled routes, with the Dial-A-Ride system providing demand responsive curb-to-curb service. Roseville Transit users can connect to both Placer County Transit and to Sacramento Regional Transit at designated transfer points. The transfer points are at the Galleria Mall and Orlando Avenue at Louis Street.
>
> In addition, Santucci Blvd. is planned to accommodate a future route for bus rapid transit (BRT). At the time of Specific Plan approval, the South Placer Regional Transportation Authority had identified several potential routes for BRT, one of which is located in Sierra Vista's planned extension of Watt Avenue (as Santucci Blvd.). If ultimately implemented, BRT would provide an express bus commuter service throughout western Placer County and to downtown Sacramento employment centers. This service would also provide connections to other transit hubs, including light rail facilities, in Sacramento County.
>
> To facilitate the expansion and use of transit, the highest intensity land uses in the SVSP have been located in proximity to major transportation corridors and potential transit stops. These uses include high density residential, mixed-use developments, employment, and the Signature Park. As an example, highest intensity commercial uses are planned at the intersections of Santucci Blvd. and Fiddyment Road with Baseline Road, which maximizes transit accessibility to a regional service area.
>
> Bus turnouts and shelters will be located and constructed in accordance with City Improvements Standards and as otherwise required by the Public Works Director for specific projects. In addition, a transfer station is planned near the intersection of Baseline and Fiddyment Roads, and will include queuing space for buses and a location for pedestrian shelters. Additional details regarding the obligations for the transfer station, including related facilities, is included in the project development agreements. The locations of these facilities are conceptually shown on Figure 6-24."

Figure 6-24 of the SVSP, referenced above, shows a total of six anticipated bus pull-out and shelter locations within the Westbrook portion of the SVSP, though the "exact number and locations" will be "determined by [the City's] Public Works Director"(SVSP, p. 6-27).

Section 6.5 of the SVSP is entitled, "Park and Ride Facilities." It reads as follows:

> "Park and ride lots provide parking for commuters to leave their vehicles to meet carpools, vanpools or access transit. In the SVSP, a total of 3 park and ride lots are dispersed throughout the Plan Area near major roadway intersections on the Baseline Road, Fiddyment Road, and Santucci Blvd. corridors. The park and ride locations shown on SVSP Parcels DF-40 and KT-41A shall provide for 50 park and ride spaces each. The

> park and ride location in SVSP Parcel WB-41 shall provide for 35 park and ride spaces. Sites designated to provide park and ride facilities are identified on Figure 6-25.
>
> Park and Ride spaces are in addition to the minimum required parking spaces for each project. These spaces will be installed with project development and maintained by the project developer, with all designated spaces signed in accordance with City standards. Park and Ride lots are intended to be made available to commuters during normal commute hours on a daily basis. Additional details regarding the obligations for the construction of park and ride lots, including related facilities, is included in the project development agreements."

Figure 6-25 of the SVSP, referenced above, shows the approximate location of a park and ride lot to be located within the Westbrook portion of the SVSP. This anticipated location would be on Santucci Boulevard not far south of its intersection with Pleasant Grove Boulevard (SVSP, p. 6-29).

The Development Agreement between the City and the Westbrook proponent also includes a number of provisions dealing with transit. For example, section 3.5.12 requires the Westbrook proponent to pay the project's fair share of the City's costs of updating the City's Long Range Transit Master Plan, its Short Range Transit Plan Update, and its Bicycle Master Plan. Section 3.5.19 requires that the Westbrook area include a Bus Transfer Station within Westbrook Parcel WB-41. "The bus transfer station shall include bus turnouts, shelters, bike lockers, park and ride spaces for 35 vehicles, and utility stubs for electric and phone service to the bus shelter site, as well as water and sewer stubs to accommodate a drinking fountain only at the bus transfer station, as determined by City at the time of approval of subsequent entitlements for Parcel WB-41[.]" (Development Agreement, p. 30.) Section 3.17 contemplates the formation of a Community Facilities District (also known as a Mello-Roos District) to be used for, among other things, "roadways serving bus transfer facilities," "bus facilities," and "transit improvements" (SVSP at p. 56).

The Draft EIS (on pages 3.14-30 and 3.14-31) describes how the City's transit planning process will continue to unfold as the landowners seek additional entitlements:

> "There are currently no Roseville Transit routes directly serving the project site. Any development of the project site … would be required to develop transit stops at key arterial intersections and at other locations as determined by the Public Works Director, in accordance with the City's Improvement Standards. Roseville Transit would provide transit services in accordance with the Short Range Transportation Plan (SRTP) and Long Range Transportation Plan (LRTP) as funding allows. Although the Roseville Transit is currently facing funding problems, the requirement that the development include transit stops at key arterial intersections and other locations determined by the Public Works Director will be sufficient to allow service to be extended to the project site. Notably, nothing about the inclusion of such transit stops will worsen the current funding problems of the Roseville Transit system, which should improve as the national and regional economies recover from the recent recession. Because development on the project site is not expected to occur to any significant degree until economic conditions improve, the City expects system revenues to increase as demand for transit service in the project area increases[.]"

In summary, although the project site (being largely undeveloped) is currently not served by public transit, the City of Roseville has put in place policies and agreements that will extend the City's existing transit system to the SVSP area, including Westbrook, as development proceeds. Although the City has not imposed on the project any mitigation measures requiring "fair share" payments for the construction of transit facilities, the City has planned the SVSP and Westbrook project at densities intended to support transit, has required or will require bus turnout and park and ride lots to facilitate transit, and expects that, as economic conditions improve, adequate resources will become available to fund the required improvements. Thus, even if the USACE, in considering approval of a permit to fill wetlands under Section 404 of the CWA and NEPA, had legal authority to impose its own mitigation on the Applicant in order to facilitate the extension of transit to the project site, the USACE would see no need to do so, in light of the City's extensive actions and commitments to require such an extension.

Response A-12

The USEPA lists a number of sustainable transportation and building measures that it recommends be imposed on the Proposed Action and alternatives to create a sustainable community.

Numerous mitigation measures are included in the SVSP EIR and Westbrook Draft EIS to reduce vehicular traffic and related emissions, as well as use of energy and water by the proposed development. In addition, City of Roseville General Plan policies related to greenhouse gas emission reduction would be applied by the City which are listed in the revised Appendix 3.3 included in the Final EIS as **Appendix B**. The project would also be required to adhere to measures included in the adopted Roseville Water Conservation and Drought Mitigation Ordinance as documented in the City's Municipal Code Chapter 14.09. Under this ordinance, the City has authority to declare water shortage conditions and implement drought-related mitigation measures. In February 2008, the City adopted Ordinance 4629, which prohibits wasteful uses of water and provides tools for water conservation during droughts (City of Roseville Ordinance 4629 Section 14.09).

All of the relevant mitigation measures already included in the Proposed Action are reproduced below for ease of reference.

Mitigation Measure AQ-1: **Dust and Construction Control Measures *(Applicability – No Action, Proposed Action, and All Alternatives*)**

In accordance with the Placer County Air Pollution Control District (PCAPCD), the Applicant shall comply with all applicable rules and regulations as listed above (e.g., Rule 202, 218 and 228). In addition, prior to the approval of a discretionary permit, the Applicant shall implement the following measures unless superseded by state or other more stringent standards:

The following mitigation measures shall be implemented to reduce short-term construction-related air quality impacts. In addition, dust control measures are required to be implemented by all projects in accordance with the City of Roseville Grading Ordinance, and the PCAPCD Fugitive Dust Rule 228.

- *Applicant shall submit to PCAPCD a Construction Emission/Dust Control Plan within 30 days prior to groundbreaking. The Applicant shall provide evidence that a plan was submitted to PCAPCD to the City. If the PCAPCD does not respond within 20 days, the plan shall be considered approved. The plan must address the minimum requirements found in section 300 and 400 of District Rule 228, Fugitive Dust (www.placer.ca.gov/airpollution/airpolut.htm). The Applicant shall keep a hard or electronic copy of Rule 228, Fugitive Dust on-site for reference.*
- *The Construction Emission/Dust Control Plan shall include a comprehensive inventory (i.e., make, model, year, emission rating) of all heavy-duty off-road equipment (50 horsepower (HP) of greater) that will be used an aggregate of 40 or more hours for the construction project. The project representative shall provide PCAPCD with the anticipated construction timeline including start date, and name and phone number of the project manager and on-site foreman. The plan shall demonstrate that the heavy-duty (> 50 HP) off-road vehicles to be used in the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 20 percent NOx reduction and 45 percent particulate reduction compared to the most recent ARB fleet average. PCAPCD shall be contacted for average fleet emission data. Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available. Contractors can access the Sacramento Metropolitan Air Quality Management District's web site to determine if their off-road fleet meets the requirements listed in this measure. (http://www.airquality.org/ceqa/Construction_Mitigation_Calculator.xls)*

The following measures are also included to reduce construction-related ROG, NOx, PM10, and PM2.5 emissions:

- *All construction equipment shall be maintained in good operating condition. Contractor shall ensure that all construction equipment is being properly serviced and maintained as per the manufacturer's specifications. Maintenance records shall be available at the construction site for verification. This measure will reduce combustion emissions of all criteria air pollutants.*
- *Prior to the issuance of any grading permits, the Applicant shall submit construction plans denoting the proposed schedule and projected equipment use. Construction contractors shall provide evidence that low emission mobile construction will be used, or that their use was investigated and found to be infeasible for the project. Low emission equipment is defined as meeting the California Air Resources Board's Tier III standards. Contractors shall also conform to any construction measures imposed by the PCAPCD as well as City Planning Staff. This measure will primarily reduce ROG, NOx, PM10, and PM2.5 exhaust emissions.*
- *Paints and coating shall be applied either by hand or by high volume, low-pressure spray. This measure will reduce evaporative ROG emissions.*
- *All construction shall comply with the following measures to reduce fugitive dust related emissions of PM10 and PM2.5:*
  - *Maintain a minimum 24-inch freeboard on soil haul trucks or cover payloads using tarps or other suitable means.*
  - *Suspend grading operations during high winds (greater than 15 mph).*
  - *Sweep streets as necessary if silt is carried off-site to adjacent public thoroughfares or occurs as a result of hauling.*
  - *Dispose of surplus excavated material in accordance with local ordinances and use sound engineering practices.*

- *Schedule activities to minimize the amounts of exposed excavated soil during and after the end of work periods.*
- *Phase grading into smaller areas to prevent the susceptibility of larger areas to erosion over extended periods of time.*
- *Pave or apply gravel to any on-site haul roads.*
- *Reestablish ground cover on the construction site through seeding and water.*
- *Clean earth moving construction equipment with water or sweep clean, once per day, or as necessary (e.g., when moving on-site), consistent with National Pollutant Discharge Elimination System Best Management Practices and the Roseville Grading Ordinance. Water shall be applied to control dust as needed to prevent dust impacts off-site. Operational water truck(s) shall be on-site, as required, to control fugitive dust. Construction vehicles leaving the site shall be cleaned, as needed, to prevent dust, silt, mud, and dirt from being released or tracked off-site.*
- *Spread soil binders on unpaved roads and employee/equipment parking areas. Soil binders shall be non-toxic in accordance with state and local regulations. Apply approved chemical soil stabilizers, or vegetated mats, etc. according to manufacturers' specifications, to all-inactive construction areas (previously graded areas which remain inactive for 96 hours).*
- *Minimize diesel idling time to a maximum of 5 minutes.*
- *Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary diesel power generators, if feasible.*
- *An Applicant representative, ARB-certified to perform Visible Emissions Evaluations (VEE), shall routinely (i.e., once per week) evaluate project related off-road and heavy-duty on-road equipment emissions for compliance with this requirement for projects grading more than 20 acres in size, regardless of how many acres are to be disturbed daily.*
- *Construction equipment exhaust emissions shall not exceed the PCAPCD Visible Emissions Rule 202. Fugitive dust is not to exceed 40 percent opacity and not go beyond property boundary at any time. Operators of vehicles and equipment found to exceed opacity limits are to be immediately notified and the equipment must be repaired within 72 hours.*

The City of Roseville is currently working with the Placer County Pollution Control District to update the standard mitigation measures. The following measures will likely be required at the time specific development is proposed.

1a. *Prior to approval of Grading/plans the Applicant shall submit a Construction Emission/Dust Control Plan to the Placer County APCD. The plan must be submitted by certified mail, or receive a date stamp or other submittal proof. This plan must address the minimum Administrative Requirements found in section 300 and 400 of APCD Rule 228, Fugitive Dust. The Applicant shall not break ground prior to receiving APCD approval of the Construction Emission/Dust Control Plan. If the Applicant has submittal proof of submittal and no response is received from the District within 20 working days the plan shall be deemed complete, and construction may begin.*

1b. *Include the following standard note on the Improvement/Grading Plan: The prime contractor shall submit to the District a comprehensive inventory (i.e., make, model, year, emission rating) of all the heavy-duty off-road equipment (50 horsepower of greater) that will be used an aggregate of 40 or more hours for the construction project. If any new equipment is added after submission of the inventory, the prime contractor shall contact the APCD prior to the new equipment being utilized. At least three business days prior to the use of subject heavy-duty off-road equipment, the project representative shall provide the District with the*

anticipated construction timeline including start date, and name and phone number of the property owner, project manager, and on-site foreman.

1c. *Prior to approval of Grading/Improvement Plans, the Applicant shall provide a plan to the Placer County APCD for approval by the District demonstrating that the heavy-duty (> 50 horsepower) off-road vehicles to be used in the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 20 percent NOx reduction and 45 percent particulate reduction compared to the most recent CARB fleet average. Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available.*

2. *Include the following standard note on the Improvement/Grading Plan: If required by the Public Works Department, the contractor shall hold a preconstruction meeting prior to grading activities. The contractor shall invite the Placer County APCD to the pre-construction meeting in order to discuss the construction emission/dust control plan with employees and/or contractors.*

3. *Prior to building permit approval, the Applicant shall show, on the plans submitted to the Building Department, that electrical outlets shall be installed on the exterior walls of both the front and back of all residences or all commercial buildings to promote the use of electric landscape maintenance equipment.*

4. *Prior to building permit approval, the Applicant shall show, on the plans submitted to the Building Department, provisions for construction of new residences, and where natural gas is available, the installation of a gas outlet for use with outdoor cooking appliances, such as a gas barbecue or outdoor recreational fire pits.*

5. *Prior to building permit approval, in accordance with District Rule 225, only USEPA Phase II certified wood burning devices shall be allowed in single-family residences. The emission potential from each residence shall not exceed a cumulative total of 7.5 grams per hour for all devices. Masonry fireplaces shall have either an EPA certified Phase II wood burning device or shall be a U.L. Listed Decorative Gas Appliance. (Rule 225)*

6. *Wood burning or Pellet appliances shall not be permitted in multi-family developments. Only natural gas or propane fired fireplace appliances are permitted. These appliances shall be clearly delineated on the Floor Plans submitted in conjunction with the Building Permit application. (Rule 225/section 302.2)*

7. *Prior to the issuance of a Building Permit, the Applicant shall show that all flat roofs with parapets shall include a white or silver cap sheet to reduce energy demands.*

8. *Diesel trucks shall be prohibited from idling more than 5 minutes. Prior to the issuance of a Building Permit, the Applicant shall show that all truck loading and unloading docks shall be equipped with one 110/208 volt power outlet for every two dock doors. Diesel Trucks idling for more than 5 minutes shall be required to connect to the 110/208 volt power to run any auxiliary equipment. 2-foot x 3-foot signage which indicates "Diesel engine Idling Limited to a Maximum of 5 Minutes" shall be shown on the building elevations and shall be submitted to the Placer County APCD prior to the issuance of Building Permits for the project.*

9. *Prior to approval of Improvement Plans, an enforcement plan shall be established, and submitted to the APCD for review, in order to evaluate project-related on-and-off- road heavy-duty vehicle engine emission opacities on a weekly basis, using standards as defined in California Code of Regulations, Title 13, Sections 2180–2194. An Environmental Coordinator, hired by the prime contractor or property owner, and who is CARB-certified to perform Visible Emissions Evaluations (VEE), shall routinely evaluate project related off-road and heavy duty on-road equipment emissions for compliance with this requirement. Operators of*

vehicles and equipment found to exceed opacity limits will be notified by APCD and the equipment must be repaired within 72 hours. (California Code of Regulations, Title 13, Sections 2180–2194).

PCAPCD Rules (Existing District requirements to be added as construction notes or referenced in conditions of approval)

New Standard Condition of Approval (for all projects): *The project shall comply with all applicable Placer County Air Pollution Control District rules and regulations, and shall obtain applicable permits and/or clearances from the District prior to the start of construction.*

The following air quality notes shall be added to the grading and/or improvement plans:

- *The contractor shall use CARB ultra low sulfur diesel fuel for all diesel– powered equipment. In addition, low sulfur fuel shall be utilized for all stationary equipment. (California Standards for Motor Vehicle Diesel Fuel, title 13, article 4.8, chapter 9, California Code of Regulations).*
- *Processes that discharge 2 pounds per day or more of air contaminants, as defined by Health and Safety Code Section 39013, to the atmosphere may require a permit. Permits are required for both construction and operation. Developers/contractors should contact the District prior to construction and obtain any necessary permits prior to the issuance of a Building Permit. (Rule 501)*
- *Pursuant to the Placer County Air Pollution Control District Rule 501, General Permit Requirements, the proposed project may need a permit from the District prior to construction. In general, any engine greater than 50 brake horsepower or any boiler with heat greater than 1,000,000 Btu per hour shall require a permit issued by the District. (Rule 501)*
- *All on-site stationary equipment which is classified as 50 hp or greater shall either obtain a state issued portable equipment permit or a Placer County APCD issued portable equipment permit. (California Portable Equipment Registration Program, Section 2452).*
- *The contractor shall utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary diesel power generators if feasible.*
- *During construction, the contractor shall minimize idling time to a maximum of 5 minutes for all diesel-powered equipment.*
- *During construction, traffic speeds on all unpaved surfaces shall be limited to 15 miles per hour or less. (Rule 228/section 401.2)*

Mitigation Measure GHG-2a: **Air Quality Measures *(Applicability – No Action, Proposed Action, and All Alternatives)***

Implement Air Quality Mitigation Measure 4.4-1, listed in Section 4.4, Air Quality (Sierra Vista EIR), which would reduce operational and construction-related emissions of criteria air pollutants and precursors, and would also act to reduce GHG emissions associated with project construction and operation. Mitigation Measure 4.4-1 is relevant because both criteria air pollutant and GHG emissions are frequently associated with combustion byproducts. Certain measures are already components of the project (i.e., Specific Plan policies, design guidelines, and standards) and/or would be applied consistent with the City's General Plan Policies, addressing GHG emissions and climate change, but are provided here for purposes of completeness.

Mitigation Measure GHG-2b: Additional Measures to Reduce GHG Emissions (*Applicability – No Action, Proposed Action, and All Alternatives*)

Each increment of new development within the project site requiring a discretionary approval (e.g., proposed tentative subdivision map, conditional use permit), shall demonstrate that GHG emissions from project construction and operation will be reduced by 30 percent from business-as-usual emissions levels projected for 2025.

For each increment of new development, the City shall submit to the developer, a list of potentially feasible GHG reduction measures to be considered in the construction and design of that portion of the project. The City's list of potentially feasible GHG reduction measures shall reflect the then-current state of the regulation of GHG emissions and climate change, which is expected to continue to evolve under the mandate of AB 32. The developer shall then submit to the City a mitigation plan that lists the measures selected to be implemented as part of the project and contains an analysis demonstrating the associated reduction in GHG emissions. The report shall also demonstrate why measures not selected are considered infeasible. The City shall review the mitigation report for the applicable increment of development and approve the report (with modifications, if considered necessary and feasible) prior to granting any requested discretionary approval for that increment of development. In determining what sort of measures should appropriately be imposed by a local government under the circumstances, the City shall consider the following factors:

- *The extent to which rates of GHG emissions generated by motor vehicles traveling to, from, and within the project site are projected to decrease over time as a result of regulations, policies, and/or plans that have already been adopted or may be adopted in the future by the Air Resources Board (ARB) or other public agency pursuant to AB 32, or by EPA;*
- *The extent to which mobile-source GHG emissions, which at the time of writing this EIR comprise a substantial portion of the state's GHG inventory, can also be reduced through design measures that result in trip reductions and reductions in trip length;*
- *The extent to which GHG emissions emitted by the mix of power generation operated by Roseville Electric, that will serve the project site, are projected to decrease pursuant to the Renewable Portfolio Standard required by SB 1078 and SB 107, as well as any future regulations, policies, and/or plans adopted by the federal and state governments that reduce GHG emissions from power generation;*
- *The extent to which replacement of CCR Title 24 with the California Green Building Standards Code or other similar requirements will result in new buildings being more energy efficient and consequently more GHG efficient;*
- *The extent to which any stationary sources of GHG emissions that would be operated on a proposed land use (e.g., industrial) are already subject to regulations, policies, and/or plans that reduce GHG emissions, particularly any future regulations that will be developed as part of ARB's implementation of AB 32, or other pertinent regulations on stationary sources that have the indirect effect of reducing GHG emissions;*
- *The extent to which the feasibility of existing GHG reduction technologies may change in the future, and to which innovation in GHG reduction technologies will continue, affecting cost-benefit analyses that determine economic feasibility; and*

- *Whether the total costs of proposed mitigation for GHG emissions, together with other mitigation measures, required for the proposed development, are so great that a reasonably prudent property owner would not proceed with the project in the face of such costs.*

In considering how much, and what kind of, mitigation is necessary in light of these factors, the City shall consider the following list of options, though the list is not intended to be exhaustive, as GHG reduction strategies and their respective feasibility are likely to evolve over time. These measures are derived from multiple sources including the Mitigation Measure Summary in Appendix B of the California Air Pollution Control Officer's Association (CAPCOA) white paper, CEQA & Climate Change (CAPCOA 2008), and the California Attorney General's Office (2008).

Energy Efficiency

- *Include clean alternative energy features to promote energy self-sufficiency (e.g., photovoltaic cells, solar thermal electricity systems, small wind turbines).*
- *Design buildings to meet CEC Tier II requirements (e.g., exceeding the requirements of the Title 24 (as of 2007) by 35 percent).*
- *Site buildings to take advantage of shade and prevailing winds and design landscaping and sun screens to reduce energy use.*
- *Install efficient lighting in all buildings (including residential). Also install lighting control systems, where practical. Use daylight as an integral part of lighting systems in all buildings.*
- *Install light-colored "cool" pavements, and strategically located shade trees along all bicycle and pedestrian routes.*

SVSP [i.e., Westbrook project] developers shall be encouraged incorporate "green building" points into the construction and design of all (additions of 25,000 square feet of office/retail commercial or 100,000 square feet of industrial floor area) projects that incorporate "green building" points in construction. Such points may be achieved through checklists identified by New Home Construction Green Building Guidelines available at www.builditgreen.org, or through a similar list that distinguishes specific measures targeting efficiencies in energy, resource use, or other measures that would also directly or indirectly result in GHG emission reductions. Specific efficiencies that would reduce GHG emissions shall be implemented where feasible, for all project areas including site design, landscaping, foundation, structural frame and building envelope, exterior finishing, plumbing, appliance use, insulation, heating, venting and air conditioning, building performance, use of renewable energy, finishes, and flooring.

SVSP [i.e., Westbrook project] developers shall be encouraged to incorporate any combination of the following strategies to reduce heat gain for 50 percent of the non-roof impervious site landscape (including roads, sidewalks, courtyards, parking lots, and driveways) into the construction and design of all new (additions of 25,000 square feet of office/retail commercial) projects:

- *Shaded (Within five years of occupancy)*
- *Paving materials with a Solar Reflective Index (SRI) of at least 29*
- *Open grid pavement system (pavement that is less than 50 percent impervious and contains vegetation in the open cells)*

- *Parking spaces under cover (defined as underground, under deck, under roof, or under building.) Any roof used to shade or cover parking should have an SRI of at least 29.*
- *Optional level of LEED certification, such as silver or gold which can allow for further reductions in energy consumption and GHG emissions.*

Water Conservation and Efficiency

The SVSP [i.e., Westbrook project] includes water conservation as part of the project. In addition, the following should be considered:

- *With the exception of ornamental shade trees, use water-efficient landscapes with native, drought-resistant species in all public area and commercial landscaping. Use water-efficient turf in parks and other turf dependent spaces.*
- *Install the infrastructure to use recycled water for landscape irrigation (part of the project).*
- *Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls. (Water Efficient Landscaping Ordinance)*
- *Design buildings and lots to be water-efficient. Only install water-efficient fixtures and appliances (e.g., Ultra low-flow toilets, no flow urinals etc.).*
- *Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff. Prohibit businesses from using pressure washers for cleaning driveways, parking lots, sidewalks, and street surfaces unless required to mitigate health and safety concerns. These restrictions should be included in the Covenants, Conditions, and Restrictions of the community.*

Solid Waste Measures

- *Reuse and recycle construction and demolition waste (including, but not limited to soil, vegetation, concrete, lumber, metal, and cardboard).*
- *Provide interior and exterior storage areas for recyclables and green waste at all buildings.*
- *Provide adequate recycling containers in public areas, including parks, school grounds, paseos, and pedestrian zones in areas of mixed-use development.*
- *Provide education and publicity about reducing waste and available recycling services.*

Transportation and Motor Vehicles

- *Promote ride sharing programs and employment centers (e.g., by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading zones and waiting areas for ride share vehicles, and providing a web site or message board for coordinating ride sharing).*
- *Provide the necessary facilities and infrastructure in all land use types to encourage the use of low or zero emission vehicles (e.g., electric vehicle charging facilities and conveniently located alternative fueling stations).*
- *At commercial land uses, all forklifts, "yard trucks," or vehicles that are predominately used on-site at non-residential land uses shall be electric-powered or powered by biofuels (such as biodiesel [B100]) that are produced from waste products, or shall use other technologies that do not rely on direct fossil fuel consumption.*

- *Implement roundabouts. (30 percent intersection emissions reduction)*
- *Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles (e.g., electric vehicle charging facilities and conveniently located alternative fueling stations) (0.5 to 1.5 percent emissions reduction).*
- *Prioritized parking within new commercial and retail areas shall be given to electric vehicles, hybrid vehicles, and alternative fuel vehicles.*
- *Incorporate bicycle lanes, routes, and intersection improvements into street systems within the Specific Plan [i.e., Westbrook project] (1 percent emissions reduction).*
- *For commercial land uses, provide adequate bicycle parking near building entrances to promote cyclist safety, security, and convenience (1 percent emissions reduction).*
- *Create Class II bicycle lanes and walking paths directed to the location of schools, parks and other destination points (1 percent emissions reduction).*
- *Encourage the public school districts to serve the project site with a student busing system, and/or enable students residing in the project to safely walk to or bicycle to school without encountering barriers such as large arterial roadways or sound walls.*
- *Construction of transit facility/amenity (bus shelters, bicycle lockers/racks, etc.) for existing public and private transit (0.5 percent emissions reduction).*
- *Provide secure bicycle storage at public parking facilities.*

Letter B

WESTPARK communities

July 12, 2013

Kathy Norton
U.S. Army Corps of Engineers
Sacramento District
1325 J Street, Room 1350
Sacramento, CA 95814

Subject: Westbrook Project, Draft Environmental Impact Statement, USACE Action ID: SPK-2005-00938

Dear Ms. Norton:

We have reviewed the Westbrook Draft Environmental Impact Statement (DEIS) and have the following comments:

Page(s)	Comment(s)	
Ex. Summ.	Throughout the discussion in the Executive Summary chapter of "Significant Effects That Cannot be Mitigated" (pp. ES-4 through ES-8), there are references to mitigation that is either "proposed" or "available" to address various categories of environmental impacts. In fact, however, as evident from other statements throughout the Draft EIS, such mitigation has already been adopted by the City of Roseville and thus is already mandatory and enforceable. The use of the words "proposed" or "available" are inaccurate insofar as they imply that the mitigation may not have yet been imposed on the project. "Adopted" would be more accurate, at least with respect to the Proposed Action, which embodies the Westbrook Project as approved by the City.	1
ES-21[1]	MM BIO-1a – This measure states that "Any mitigation bank proposed to be used shall be located within Placer County and shall include the project site within its service area." We are aware of no requirement that compensatory wetland be located within the same county in which the impact occurs. Approved service areas commonly cross county lines. The Corps' mitigation regulations do not require or suggest that mitigation	2

[1] / This same comment applies to Mitigation Measure BIO-1a as it appears on page 3.4-61.

1420 Rocky Ridge Drive, Suite 265 ▪ Roseville, CA 95661 ▪ 916.774.3400 p ▪ 916.774.3434 f
westparkcommunities.com

Corps' mitigation regulations do not require or suggest that mitigation banks be located within the same county in which the impact occurs. We also note that the evaluation factors that the Corps uses to determine mitigation ratios does not have an adjustment factor for whether the mitigation would be located within the same county in which the impact occurs. As such we believe that this restriction is unwarranted.

Please modify Mitigation Measure BIO-1a as follows:

Prior to the approval of the Record of Decision for the Proposed Action, in order to mitigate for the unavoidable loss of wetlands and other waters of the U.S., the Applicant shall develop a compensatory mitigation and monitoring plan that will consist of restoration or and establishment of aquatic resources on the project site and purchase of vernal pool and seasonal wetlands creation/restoration credits, and/or provide permittee-responsible restoration at an off-site location. This plan shall be implemented prior to or concurrent with the occurrence of impacts. The mitigation and monitoring plan shall include plans for the restoration or establishment of aquatic habitat to adequately offset and replace the aquatic functions and services that would be lost within the project area, and contain an adequate margin of safety to reflect anticipated success, as well as identify any off-site locations proposed for compensatory mitigation and/or identify the mitigation bank proposed to be used and the credits of each habitat type proposed to be purchased. Any mitigation bank proposed to be used ~~shall be located within Placer County and~~ shall include the project site within its service area. In addition, in order to reduce cumulative impacts within the area, the Applicant shall attempt to identify and utilize a mitigation bank located within the same watershed as the proposed impacts. The submitted mitigation and monitoring plan shall include the mitigation location and design drawings, vegetation plans, including target species to be planted, and final success criteria, and shall be presented in the format of current guidance (e.g., USACE Sacramento District's "Habitat Mitigation and Monitoring Proposal Guidelines," dated December 30, 2004, USACE regulations at 33 CFR 332, etc.). The compensatory mitigation plan shall ensure no net loss of wetland functions and services of all aquatic resources that would be removed, lost, and/or degraded as a result of implementing the proposed project or any alternative.

Within the Record of Decision for the Proposed Action, the USACE shall document its determination regarding the appropriate amount and type of

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restoration or establishment required to ensure no net loss of aquatic resource functions and services, based on a number of factors, including the functions of the resources being impacted, the difficulty of replacing the specific resource, uncertainty and risk of failure, indirect impacts and temporal loss. Any approval of a final mitigation and monitoring plan by the USACE shall include requirements for site protection, the implementation of appropriate financial assurances and monitoring of the creation and/or restoration areas in accordance with applicable regulations and guidance.

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ES-23 For comments on "Mitigation Measure BIO-2a," see our comments below on the measure as it appears on page 3.4-71.

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ES-24 – ES-25 Mitigation Measures BIO-4 and BIO-5 apply only to the Off-Site Alternative, which would occur on property currently located outside the City of Roseville and thus beyond its current legal jurisdiction. As we explain below in our comments on pages 2.0-27 - 2.0-28 below, implicit in the notion that the City would impose these measures are the assumptions (i) that the Placer County Local Agency Formation Commission (LAFCO) would vote to expand the City's existing sphere of influence to include the off-site property, and (ii) that the City would seek, and LAFCO would approve, the eventual annexation of the property to the City. Unless these assumptions are made explicit, readers will logically assume that the local agency with land use authority over the site would be the County of Placer.

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ES-26 The summary discussion of Impact BIO-6 includes Mitigation Measure BIO-6 (Relocate Western Spadefoot Toad). Footnote 1 to the discussion states that "[t]his measure is substantially the same as Mitigation Measure 4.8-2 in the Sierra Vista Specific Plan EIR and was adopted by the City of Roseville at the time of project approval and will be enforced by the City." This statement is not wholly accurate. It is true that, in adopting the original Sierra Vista Specific Plan (which included an "urban reserve" designation for the Westbrook property), the City adopted Mitigation Measure 4.8-2 with respect to the entire Specific Plan area. By its own terms, though, the measure required an initial showing that impacted vernal pools actually included this species (the toad), and the specified additional steps in the measure were to be taken *only* if the species' presence was indicated. Importantly, the City did *not* include Mitigation Measure BIO-6 in the Mitigation Monitoring Program (MMP) approved by the City for the Westbrook Amendment to the Sierra Vista Specific

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Plan. This omission reflects the fact that the applicant's biologists have determined that the pools affected by Westbrook do not include any Western Spadefoot Toads. Because this species is not listed under federal law and is only a "species of concern" to the state, no mitigation would appear to be warranted. 5

2.0-6 Re the last sentence in section 2.4: Placer County approved the Regional University Specific Plan in 2008 (November), not 2009. 6

2.0-27 - 2.0-28 As noted above, the discussion of the Off-Site Alternative should state clearly whether the Corps is assuming (i) that the Placer County LAFCO would vote to expand the City's existing sphere of influence to include the off-site property, and (ii) that the City would seek, and LAFCO would approve, the eventual annexation of the property to the City. We assume that the Corps is making these assumptions, but has simply not made them explicit. For the sake of clarity, they should be made explicit. The property is currently located in the unincorporated area of Placer County, although the text notes that the proponents of the old Placer Ranch project submitted a development application with the City in 2007. Perhaps this reference to the 2007 application is intended to signal that the proponents of a hypothetical proposal similar to Westbrook would similarly seek to become a part of the City. This reference, though, is not enough to clearly make such a point. 7

2.0-34 Re the last sentence in the first paragraph of section 2.6.3: the Board of Supervisors *approved* (not just "considered") the Regional University Specific Plan in (November) 2008.

Re section 2.6.4: we propose the following edits to the last sentence in the first paragraph in order to achieve a greater level of factual accuracy: "The County Board of Supervisors directed staff to proceed with studying the [Curry Creek] area for future development in 2003, but at this time there is no proposed or adopted community plan, specific plan or formal development application for the site." 8

2.0-35 Re section 2.6.6: we propose the following edits to the second sentence in the first paragraph of this section, again in order to achieve a greater level of factual accuracy: "The County approved the CP in 1990, modified it as part of the approval of an updated General Plan in 1994, and ~~the plan was~~ subsequently revised it again in 2007 as part of the Placer Vineyards project approvals." Explanation: in approving the General Plan in 1994, 9

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	the Board of Supervisors also approved something called Exhibit 1 to the Dry Creek West Placer Community Plan. Exhibit 1 was a template for what became the Placer Vineyards Specific Plan. The PVSP then replaced what had been the entire western area of the Community Plan.	9
3.0-10	Re the section entitled, "Present and Reasonably Foreseeable Future Actions under the Placer County General Plan": to our knowledge, the official title of the Regional University Specific Plan does not include any reference to "and Community." (There are similar references throughout the Draft EIS, which should be changed as well.)	10
3.3-36	The language introducing the discussion of Cumulative Impact AQ-1 includes what appears to be an inadvertent misstatement, namely, that No Action Alternative, the Proposed Action, and Alternatives 1 through 6 would have a *less than significant* cumulative impact from construction emissions. This conclusion, which we believe should be corrected in Errata published as part of the Final EIR, cannot be reconciled with statements made on page 3.3-39 to the effect that, at least for ROG, "the contribution of the construction phases of the Proposed Action or the alternatives to the cumulative impact on air quality in the Air Basin would be *significant* even with implementation of Mitigation Measure AQ-1." (Italics added; bolded emphasis from original omitted).)	11
3.4-61 – 3.4-62	With respect to Mitigation Measure BIO-1b, we would like to see the Final EIS acknowledge that the use of an approved mitigation bank that includes the projeet site within its service area would satisfy the requirements of the measure.	12
3.4-71	The discussion of No Action Alternative assumes that the way to avoid adverse effects on federally listed vernal pool species would be to obtain a biological opinion from the USFWS. Under this scenario, however, there would be no Corps permit. Absent any other federal agency's involvement, the proper mitigation would thus seem to be to avoid any illegal "take" of these species or to apply for an HCP under Section 10.	13
3.4-76	Footnote 3 states that the proposed mitigation measure for Western Spadefoot Toad "is substantially the same as Mitigation Measure 4.8-2 in the Sierra Vista Specific Plan EIR and was adopted by the City of Roseville at the time of project approval and will be enforced by the City." As noted earlier, the Mitigation Monitoring Program for Westbrook does *not* include any such mitigation measure.	14

3.5-10 Near the top of the page, the text states that the PCAPCD must "ensure compliance with AB 32 reduction targets[.]" We are unaware of any such legal duty under AB 32, which does not delegate any direct regulatory or enforcement authority to Air Pollution Control Districts with respect to local land use decisions. 15

3.6-15 The text of Mitigation Measure CR-1b, which has been included to ensure the Corps' compliance with the National Historic Preservation Act, includes two potentially confusing standards for avoiding or minimizing impacts to historical resources: (i) what is "possible" and (ii) what is "feasible." To avoid confusion, we advocate using only the latter standard, which is already used in Mitigation Measure CCR-1a, which closely tracks (with some additions) the City's Mitigation Measure 4.9-1. We therefore suggest the following changes to the third "bullet" in the text of Measure CR-1b:

> *Once the inventory is complete, the USACE (or designee, as directed by the USACE) shall prepare a Finding of Effect (FOE) to assess the effect of the buildout of the individual development phase upon identified historic properties by applying the Criteria of Adverse Effect pursuant to 36 CFR 800.5(a) (1). If the FOE identifies adverse effects, the Applicant shall prepare treatment measures and protocols to minimize these impacts to the extent ~~possible~~ feasible. These treatment measures shall be appended to the PA in a treatment plan prepared for the specific project development phase. Treatment measures may include, but are not limited to, avoidance and preservation in places where ~~possible~~ feasible. Where avoidance is not ~~possible or~~ feasible, treatment shall consist of either: (1) recovery of a suitable sample of material from archaeological sites that have the potential to contribute to research, or (2) documentation of historic resources to capture their significance and relationship to important historical themes. Documentation of historical resources shall be performed according to the Historic American Building Survey or Historic American Engineering Record (HABS/HAER) specifications or an equivalent standard when existing architecture or engineered features are subject to adverse effects. Where appropriate, treatment plans may specify the preparation and circulation of interpretive brochures, narrative descriptions, and photographic documentation for the general public.*

16

3.12-16, 3.12-17 The text on these pages describes Mitigation Measure NOISE-2b, which would address noise at "the proposed community-wide park," as being the same as MM 4.6-3 in the City's Sierra Vista EIR, and then goes on to state 17

that the City will enforce this measure with respect to the Proposed Action. In fact, however, the City's Mitigation Monitoring Program for Westbrook does not include the text of MM 4.6-3. This is because the Westbrook project does not include the "community-wide park" that is the subject of the SVSP mitigation measure. As the City's Initial Study explained (on page 32), "[a] neighborhood park is proposed in the plan area. Due to the passive nature of parks, the City has determined that neighborhood parks adjacent to residential uses are compatible. Therefore, park noise impacts are considered less than significant." (See also Final EIR for SVSP, pp. 4.6-33 – 4.6-34 [explaining why noise impacts from *neighborhood* parks are less than significant].) For these reasons, Measure NOISE-2b should be eliminated, as it was not imposed by the City and is not necessary. 17

3.12-25 The third bullet in Mitigation Measure NOISE-3, which applies only to "[t]entative map applications for residential uses located along Fiddyment Road," is not included in the City's Mitigation Monitoring Program, and thus should be eliminated. This particular component of Mitigation Measure 4.6-3 was unnecessary as applied to the Westbrook site, which does not abut Fiddyment Road and thus does not include any residential uses along that roadway. 18

3.13-4 In the middle of the second paragraph of the discussion of the impacts of the Proposed Action and Alternatives 1 through 5 on school facilities, the text can be read to suggest that *state law* requires the applicant to enter into "school fee agreements" with affected school districts. This is not quite right. State law provides that the payment of school impact fees constitutes full mitigation for impacts to school facilities, but does not require developers to enter into formal agreements with school districts. 19

3.14-24 Mitigation Measure TRA-1 does not track the abbreviated version of Mitigation Measure 4.3-1 reflected in the Mitigation Monitoring Program for Westbrook (at page 6), which specifies transportation improvements different than those found on page 3.14-24 of the Draft EIS. The different improvements identified in the EIS will not be built "as part of the [Westbrook] project" because they are not located adjacent to or within the boundaries of Westbrook. The proper improvements to identify would be "Blue Oaks Boulevard/Diamond Creek" and "Industrial Avenue and Alantown Drive." 20

3.15-47	The City's water demand numbers in Table 3.15-5 do not match those of Table 5.7-44 in the Final EIR for the Sierra Vista Specific Plan. In particular, the "City Buildout Demand" for surface water in Table 5.7-44 [EIR] is 54,757 acre feet per year, whereas the parallel figure in Table 3.15-5 [EIS] is 62,695 afy. The result is that Table 3.15-5 shows a cumulative shortfall worse than it really is. The supposed shortfall of 10,425 does not account for steps the City takes in dry years to reduce demand through conservation measures and to increase supply through increased groundwater withdrawals. The 10,425 number should be smaller, as the City has said it has adequate water for Sierra Vista, Westbrook, and Creekview.	21
4.0-1, 4.0-5	References to the California Administrative Code should be changed to the California Code of Regulations.	22

In addition, please find attached the following items: 1) Number clean up for the DEIS tables and 2) Applicant prepared Section 404(b)(1) Alternatives Analysis for the Westbrook Project, Army Corps Permit Application No. SPK-2005-00938.

If you have any questions please do not hesistate to contact me.

Sincerely,

Jeff Jones
Westpark Communities

Enclosures

cc: Jim Moose, Remy, Moose & Manley
Tom Skordal, Gibson & Skordal

would connect the alternative site to existing recycled water lines to the east and south of the alternative site.

Table ES-1, Proposed Action and Alternatives – Acreages by Land Use and Potential Waters of the U.S. Impacts, presents the key attributes of the Proposed Action and the on- and off-site alternatives and the potential impacts to the waters of the U.S. anticipated to result from the development of the Proposed Action and alternatives.

Table ES-1
Proposed Action and Alternatives – Acreages by Land Use and Potential Waters of the U.S. Impacts

Alternative	Development Footprint	Residential Acreage	Residential Units at Buildout	Other Development Acreage		Open Space Acreage	Potential Impacts on Aquatic Resources[1]
Proposed Action	361	245	2,029	Commercial	43	36	~~9.61~~ 9.56 (2.98 acres preserved)
				Public/Quasi-Public	11		
				Parks	16		
				Roads[2]	46		
No Action	275	177	~~1,412~~ 1505	Commercial	30	122	0 (12.55 acres preserved)
				Public/Quasi-Public	12		
				Parks	14		
				Roads[2]	44		
Reduced Footprint/ Increased Density	267	153	1,890	Commercial	40	130	3.10 (9.47 acres preserved)
				Public/Quasi-Public	12		
				Parks	16		
				Roads[2]	47		
Reduced Footprint/ Same Density	267	158	1,405	Commercial	40	130	3.10 (9.47 acres preserved)
				Public/Quasi-Public	12		
				Parks	11		
				Roads[2]	47		
Central Preserve	271	162	1,415	Commercial	40	126	~~5.05~~ 5.03 (~~2.52~~ 2.51 acres preserved)
				Public/Quasi-Public	11		
				Parks	12		
				Roads[2]	~~35~~ 40		
One Acre Fill	236	140	1,340	Commercial	23	161	~~0.95~~ 0.93 (11.63 acres preserved)
				Public/Quasi-Public	12		
				Parks	13		
				Roads[2]	49		
Half Acre Fill	223	129	1,256	Commercial	19	174	0.47 (12.08 acres preserved)
				Public/Quasi-Public	13		
				Parks	13		
				Roads[2]	50		

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Alternative	Development Footprint	Residential Acreage	Residential Units at Buildout	Other Development Acreage		Open Space Acreage	Potential Impacts on Aquatic Resources[1]
Off-Site	346	179	1,560	Commercial/ Industrial	80	60	11.92[3] (3.9 acres preserved)
				Public/Quasi-Public	12		
				Parks	14		
				Roads[2]	~~15~~	61	

[1] *Preliminary estimate based on land use plans and existing information on wetlands and other jurisdictional waters on the project site. Acres of aquatic resources preserved under the alternative are reported in parentheses.*

[2] *Includes the area of major roads and landscape corridors.*

[3] *This alternative would also fill an additional 0.3 acre of the waters of the U.S. off-site in association with the construction of the off-site infrastructure improvements for a total impact of about 6.5 acres.*

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Major Conclusions of the Environmental Analysis

Summary of Environmental Effects and Mitigation Measures

The environmental effects of the Proposed Action and alternatives, and mitigation measures to reduce those effects, are summarized in **Table ES-2, Summary of Effects for Major Topics**, later in this section. This table lists all effects of the Proposed Action and the alternatives. **Chapter 3.0, Affected Environment and Environmental Consequences**, of the EIS includes a discussion of all potential effects, including effects that would be less than significant and would not require mitigation. The basis of the impact conclusions summarized in the table consists of regulatory thresholds for those resource topics for which such thresholds exist, and qualitative thresholds for other resource topics. The siguificance thresholds are described for each topic in **Chapter 3.0.**

Significant Effects That Cannot Be Mitigated

The Proposed Action and alternatives would result in several direct and indirect significant effects that cannot be fully mitigated, as described below.

Aesthetics

The visual resource analysis in this EIS evaluates the effects of the proposed development in terms of loss of scenic views, alterations to the visual character of the area, and the introduction of substantial new sources of light and glare. The project site is currently undeveloped and is characterized by gently rolling topography and large, open annual grassland areas. Views of the project site, the Sierra foothills, and the Sierra Nevada are available from Market Street, adjacent to the site on the east.

With the implementation of the Proposed Action, No Action Alternative, and Alternatives 1 through 5, the project site would be developed with a variety of urban uses and views of open rangeland and the foothills and Sierra Nevada would no longer be available from Market Street. In addition to loss of views, the conversion of undeveloped rangeland to urban development under all of these alternatives would

Letter B

Table 2.0-4
Proposed Action and Alternatives – Acreages by Land Use and Aquatic Resource Impacts

Alternative	Development Footprint	Residential Acreage	Residential Units at Buildout	Other Development Acreage		Open Space Acreage	Potential Direct Impacts on Aquatic Resources[1]
Proposed Action	361	245	2,029	Commercial	43	36	~~9.61~~ 9.56 (2.98 acres preserved)
				Public/Quasi-Public	11		
				Parks	16		
				Roads[2]	46		
No Action	275	177	1,505	Commercial	30	122	0 (12.55 acres preserved)
				Public/Quasi-Public	12		
				Parks	14		
				Roads[2]	44		
Reduced Footprint/ Increased Density	267	153	1,890	Commercial	40	130	3.10 (9.47 acres preserved)
				Public/Quasi-Public	12		
				Parks	16		
				Roads[2]	47		
Reduced Footprint/Same Density	267	158	1,405	Commercial	40	130	3.10 (9.47 acres preserved)
				Public/Quasi-Public	12		
				Parks	11		
				Roads[2]	47		
Central Preserve	271	162	1,415	Commercial	40	126	~~5.05~~ 5.03 (~~7.52~~ 7.51 acres preserved)
				Public/Quasi-Public	11		
				Parks	12		
				Roads[2]	46		
One Acre Fill	236	140	1,340	Commercial	23	161	~~0.94~~ 0.92 (11.63 acres preserved)
				Public/Quasi-Public	12		
				Parks	13		
				Roads[2]	49		
Half Acre Fill	223	129	1,256	Commercial	19	174	0.47 (12.08 acres preserved)
				Public/Quasi-Public	13		
				Parks	13		
				Roads[2]	50		
Off-Site	346	179	1,560	Commercial/Industrial	80	60	11.92 (3.9 acres preserved)
				Public/Quasi-Public	12		
				Parks	14		
				Roads[2]	~~42~~ 61		

[1] *Preliminary estimate based on land use plans and existing information on wetlands and other jurisdictional waters on the project site. Acres of aquatic resources preserved under the alternative are reported in parentheses.*

[2] *Includes the area of major roads and landscape corridors.*

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Associates 2009). The U.S. Fish and Wildlife Service (USFWS) requires two-year protocol surveys to assume absence (North Fork Associates 2009; USFWS 1995).

Based on protocol surveys for listed invertebrates in the 2005–2006 and 2006–2007 wet seasons, the Applicant's consultant reports that two watersheds entirely within the project site and two watersheds partially within the project site were occupied by listed invertebrates, while three of the watersheds on the project site were not occupied (**Figure 3.4-3, Project Site Jurisdictional Wetlands and Watersheds**) (ECORP 2006a and ECORP 2007c). Vernal pool fairy shrimp were detected during these surveys, but neither vernal pool tadpole shrimp nor Conservancy fairy shrimp were detected. Both of these species have a very restricted known distribution in western Placer County compared with the vernal pool fairy shrimp making them unlikely to occur on the project site. The Applicant conducted the survey by dividing the site into watersheds and sampling each watershed. If a listed branchiopod was detected, the Applicant stopped further sampling in that watershed and assumed that all suitable habitat within that watershed was occupied. In watersheds where no listed invertebrates were detected in the first wet season, the Applicant continued sampling for two full wet seasons (Gibson & Skordal 2010).

Table 3.4-5, Listed Invertebrates Potential Habitat within Project Impact Area, below, presents the potential habitat for listed invertebrates present on the project site, organized in terms of potential habitat within watersheds where invertebrates were detected and potential habitat within watersheds where the species were not detected, as well as the total potential habitat within the project impact area.

Table 3.4-5
Listed Invertebrates Potential Habitat within Project Impact Area

Type	Acres of Potential Habitat within Occurrence Detected Watersheds	Acres of Potential Habitat within No Occurrence Detected Watersheds	Total Potential Habitat
Vernal Pools	2.38	0.22	2.60
Seasonal Wetlands	1.17	0.21	1.38
Wetland Swales	6.15	1.64	7.80
Swale Depressional	1.18	0.00	1.18
Total*	9.70 10.88	2.07	~~11.78~~ 12.96

Source: Gibson & Skordal 2012a; Impact Sciences 2012
** Total includes vernal pools, seasonal wetlands, and wetland swale habitat. Swale depressional is a subset of wetland swale habitat.*

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The habitat used by the branchiopods that are documented to occur within the project impact area includes vernal pools, and other similar seasonally flooded depression and depressional seasonal wetlands. Aquatic habitat that is not considered to be suitable branchiopod habitat includes streams and perennial ponds. As the table above shows, within the watersheds where listed invertebrates were detected, there are a total of 2.38 acres (0.96 hectare) of vernal pools, 1.17 acres (0.47 hectare) of seasonal wetlands, 6.15 acres (2.49 hectares) of wetland swales, and 1.18 acres (0.48 hectare) of swale depressional habitat; this amounts to 10.88 acres (4.40 hectares) of aquatic habitat in these watersheds.

project site. In addition, impervious surfaces added to the site under this alternative could potentially change the hydrology of the wetlands. However, because of the 100-foot buffers included in the alternative, and the low level of development on the project site under this alternative, the **indirect** effects would be **less than significant.**

Proposed Action

Direct Effects from Placement of Fill

As shown in **Table 3.4-9a, Proposed Action Impacts to Waters of the U.S.,** implementation of the Proposed Action would result in the filling of 9.61 acres (3.89 hectares) of wetlands and "other waters" of the U.S., resulting in the loss of aquatic resource area and functions. This total includes 9.56 acres (3.87 hectares) of on-site impacts and 0.05 acre (0.02 hectare) of off-site impacts and comprises placement of fill in 0.62 acre (0.25 hectare) of seasonal wetlands, 0.87 acre (0.35 hectare) of vernal pools, and 7.00 acres (2.83 hectares) of wetland swales. **Figure 3.4-5** shows the affected aquatic resources on the project site and in the off-site impact area.

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8.12

Within the project site boundaries, 2.98 acres (1.21 hectares) of on-site vernal pools and other aquatic resources would be preserved and 9.56 acres (3.87 hectares) of the 12.55 acres (5.08 hectares) of waters of the U.S. would be filled. Loss of aquatic resources would occur as a result of grading in preparation for development, construction of roads and utility corridors, and other ground-disturbing activities related to construction. Given that the on-site vernal pools and seasonal wetlands that would be filled are highly disturbed from disking, grazing, and cultivation and the Proposed Action would fill a small acreage of the waters of the U.S., the effect is considered **less than significant.**

To address the filling of the waters of the U.S., the Applicant has put forth a mitigation plan to compensate for the loss of wetlands and other waters of the U.S. that will consist of preservation and creation of aquatic resources on the project site and purchase of constructed vernal pools and other wetlands creation/restoration and preservation credits from an approved conservation bank in western Placer County. The key elements of the conceptual mitigation plan are described below (See **Appendix 3.4** for the Applicant's conceptual compensatory mitigation plan). **Table 3.4-9b, Proposed Action Impacts and Mitigation Area Summary,** presents acres of wetlands that would be affected under the Proposed Action and acres of wetlands that would be created or preserved under the Applicant's conceptual compensatory mitigation plan.

On-Site Preservation

The conceptual compensatory mitigation plan proposes preservation of 2.98 acres (1.21 hectares) of wetlands and other waters of the U.S. on the project site in perpetuity and managed to maintain their resource functions and values. These would be preserved within the designated open space on the project site.

areas only, the alternative would directly affect about 1.95 acres (0.79 hectare) of invertebrate aquatic habitat within watersheds where listed vernal pool invertebrates were detected and about 0.56 acre (0.23 hectare) in watersheds where listed vernal pool invertebrates were not detected for a total direct effect on 2.51 acres (1.02 hectares). In addition, development under this alternative would have the potential to indirectly affect about 0.31 acre (0.13 hectare) of invertebrate aquatic habitat.

If suitable invertebrate aquatic habitat is defined to include vernal pools, seasonal wetlands and wetland swales, then based on the numbers in Table 3.4-17, Alternative 3 would directly affect about 5.26 acres and indirectly affect another 0.27 acre of this habitat.

The loss of listed vernal pool invertebrates or their habitat as a result of grading, filling, or indirect degradation would be a **significant direct** and **indirect** effect of the alternative.

Mitigation Measure BIO-1a would reduce impacts on listed vernal pool invertebrate habitat by providing replacement habitat and preserving wetlands similar to those removed by the alternative. **Mitigation Measures BIO-1b** and **BIO-2b** would also be implemented to avoid or reduce both direct and indirect impacts on vernal pool species habitat within the preserved areas on the project site. The **direct** and **indirect** effect would be **less than significant** with mitigation.

Table 3.4-17
Alternative 3 Impacts to Listed Vernal Pool Invertebrate Habitat (in Acres)

		Project Site			Off-Site	
Type	Total Potential Habitat	Occurrence Detected Watersheds - Direct Impacts	Occurrence Not Detected Watersheds - Direct Impacts	Occurrence Detected Watersheds - Indirect Impacts	Occurrence Detected Watersheds - Direct Impacts 1	Occurrence Detected Watersheds - Indirect Impacts 2
Vernal Pools	2.60	0.47 ~~1.45~~	0.10	N/A	0.01	0.07
Seasonal Wetlands	1.38	0.58 ~~0.34~~	0.21	N/A	0.00	0.03
Wetland Swales	7.80	2.20	~~1.25~~	N/A	0.00	0.00
Swale Depressional	1.18	0.44	0.25[3]	N/A	0.01	0.04
Total[4]	**5.16**	**1.93**	0.50 ~~0.56~~	**0.17[6]**	**0.02**	**0.14**
Total[5]	**11.78**	**3.69**	~~1.56~~ 1.75	**0.17**	**0.01**	**0.10**

Source: Gibson & Skordal 2012a and 2012c; Impact Sciences 2012

1 *Off-Site direct impacts are assumed to occur to invertebrate habitat within a 30-foot band of the project site.*

2 *Off-Site indirect impacts are assumed to occur to invertebrate habitat between 30 feet and 250 feet of the project site.*

3 *This number was estimated using the ratio of the acreage of swale depressional found within wetland swales in occurrence-detected watersheds for the Proposed Action.*

4 *Total includes vernal pools, seasonal wetlands, and swale depressional habitat.*

5 *Total includes vernal pools, seasonal wetlands and wetland swales.*

6 *This acreage is within 250 feet (76 meters) of development and therefore will be indirectly affected.*

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Letter B: Westpark Communities, Jeff Jones, dated July 12, 2013

Response B-1

The Applicant is correct that the mitigation referred to in the Executive Summary for most part is the mitigation imposed on and incorporated into the Proposed Action when the Westbrook project was reviewed and approved by the City of Roseville pursuant to CEQA. Mitigation measures under CEQA have been incorporated only into the Proposed Action but not into any of the alternatives evaluated in the Draft EIS. In the case of certain resources (mainly wetlands and biological resource impacts), new mitigation is proposed by the USACE, and those mitigation measures have not yet been incorporated into the Proposed Action or the alternatives. The Executive Summary text has been revised to remove the word "proposed." Changes to the Executive Summary text are shown in **Chapter 3.0, Errata**.

Response B-2

The USACE agrees with the suggested changes. Mitigation Measure BIO-1a has been revised. The correction is shown in **Chapter 3.0, Errata**.

Response B-3

Comment noted.

Response B-4

Text has been added to the Executive Summary explaining why the EIS evaluates the alternative site as being under the jurisdiction of the City of Roseville. See **Chapter 3.0, Errata**.

Response B-5

Based on the information presented by the Applicant demonstrating that toads are not present on the project site, the USACE agrees that the Proposed Action (or any of the on-site alternatives) would not adversely affect western spadefoot toad, and therefore the impact discussion has been revised and the mitigation measure deleted in the Final EIS. Changes to the Executive Summary and Section 3.4, Biological Resources are shown in **Chapter 3.0, Errata**.

Response B-6

The USACE agrees with the suggested changes. The last sentence in Section 2.4 has been corrected. The correction is shown in **Chapter 3.0, Errata**.

Response B-7

Additional information has been added to the Project Description explaining why the EIS evaluates the alternative site as being under the jurisdiction of the City of Roseville. The added text is shown in **Chapter 3.0, Errata**.

Response B-8

The USACE agrees with the suggested changes. The last sentence in Section 2.6.3 and the last sentence in Section 2.6.4 have been corrected. The corrections are shown in **Chapter 3.0, Errata**.

Response B-9

The USACE agrees with the suggested changes. Changes to the text in Section 2.6.6 are shown in **Chapter 3.0, Errata**.

Response B-10

The title of the Regional University Specific Plan in Chapter 1.0 Introduction, Chapter 3.0 Environmental Setting, Section 3.1 Aesthetics, Section 3.2 Agricultural Resources, and Section 3.11 Land Use and Planning has been corrected as suggested in the comment. Changes to the text are shown in **Chapter 3.0, Errata**.

Response B-11

The Applicant is correct in that the reactive organic gases (ROG) emissions associated with the construction of the Proposed Action and the alternatives will exceed air district thresholds even after the application of mitigation measures. Therefore, the construction activities associated with the Proposed Action and all of the alternatives would result in a significant cumulative impact on air quality. Changes to the text of Cumulative Impact AQ-1 are shown in **Chapter 3.0, Errata**.

Response B-12

The USACE agrees with the suggested changes. Changes to the text of Mitigation Measure BIO-1b are shown in **Chapter 3.0, Errata**.

Response B-13

Complete avoidance of all direct and indirect impacts on listed species, suggested in the comment, is not feasible under the No Action Alternative as defined in the Draft EIS. It is true that absent a permit from the USACE, the Applicant would need to consult with and obtain a take permit from the U.S. Fish and Wildlife Service (USFWS) under Section 10 of the Endangered Species Act. Mitigation Measure BIO-2a simply requires the Applicant to obtain a biological opinion and an incidental take permit from the USFWS without specifying how it is done. No changes to the mitigation measure text are necessary in response to this comment.

Response B-14

Please see **Response B-5**, above.

Response B-15

The USACE agrees with the suggested changes. The text in the Climate Change section has been deleted as shown in **Chapter 3.0, Errata**.

Response B-16

The USACE agrees with the suggested changes. Changes to the text of Mitigation Measure CR-1b are shown in **Chapter 3.0, Errata**.

Response B-17

The USACE agrees with the suggested changes. Changes to the text of Impact NOISE-2 and associated Mitigation Measure NOISE-2b are shown in **Chapter 3.0, Errata**.

Response B-18

The USACE agrees with the suggested changes. Changes to the text of Impact NOISE-3 and associated Mitigation Measure NOISE-3 are shown in **Chapter 3.0, Errata**.

Response B-19

The USACE agrees with the comment. Changes to the text of Impact PUB-3 are shown in **Chapter 3.0, Errata**.

Response B-20

The suggested changes have not been made to Mitigation Measure TRA-1. The differences in the locations of significant traffic impacts between the analysis conducted by the City and the analysis conducted by the USACE due to the fact that the City's analysis assumed that Sierra Vista Specific Plan road network would be built to the south of the Westbrook project site and available for traffic from the Westbrook project to travel to major arterials such as Baseline Road. The USACE's analysis on the other hand did not assume that the Sierra Vista Specific Plan roadways would be built because that project has not yet been approved by the USACE. As a result, the analysis assumed that traffic from the Westbrook project site would use Pleasant Grove Boulevard and other existing streets. Consequently, the Draft EIS traffic analysis showed significant traffic impacts at other intersections. Text has been added in the EIS to explain this issue, and to state that should the Sierra Vista Specific Plan not be approved and/or implemented and the Westbrook project is approved and moves towards implementation, it is assumed that the traffic impacts will occur at the locations identified in the EIS and it is assumed that the City will adopt revised mitigation measures that will require the Applicant to mitigate traffic impacts at these other locations. Changes to the text of Impact TRA-1 are shown in **Chapter 3.0, Errata**.

Response B-21

The City of Roseville buildout demand presented in the Westbrook project Draft EIS cumulative water demand is based on more recent information obtained from the City. Table 3.15-5 presents the most up to date data regarding water demand and supply within the City's service area. The table also presents near-term shortfall which is about half the long-term shortfall. Please note that both shortfall numbers simply reflect the difference between projected demand and supply in normal water years. It is acknowledged that water utilities will implement conservation and pump more groundwater if necessary to close the gap between supply and demand, and it is anticipated that the City will also do that plus secure more water supply sources over time. The Draft EIS acknowledges that water demand associated with buildout of the City's General Plan and the Proposed Action would be supplied by existing and assured sources of water, and as a matter of policy, the City will not approve new specific plans or other projects absent sufficient water for buildout of such plans and projects. No changes to the Draft EIS text are necessary in response to this comment.

Response B-22

The suggested correction has been made to the Draft EIS text. Changes to the text of Other Statutory Requirements chapter are shown in **Chapter 3.0, Errata**.

Response B-23

The USACE has reviewed the suggested changes and concurs with them. Corrections to Table ES-1 are shown in **Chapter 3.0, Errata**. The acreage of aquatic resource impact for the Proposed Action was not changed because based on the August 2013 Final Mitigation Plan the number is correct.

Response B-24

The USACE has reviewed the suggested changes and concurs with them. Corrections to Table 2.0-4 and associated text are shown in **Chapter 3.0, Errata** The potential impacts to aquatic resources from the Proposed Action was not changed because based on the August 2013 Final Mitigation Plan the number is correct.

Response B-25

Based on input from the USFWS, all tables in Section 3.4 of the EIS have been revised to eliminate swale depressional habitat. That habitat was a subset of the swale habitat and was reported as a line item in a number of tables. The revised tables, including Table 3.4-5, are shown in **Chapter 3.0, Errata**.

Response B-26

The USACE concurs with this correction. The revision to the text of Impact BIO-1 is shown in **Chapter 3.0, Errata**.

Response B-27

Based on input from the USFWS, the EIS no longer distinguishes between "Occurrence Detected Watersheds" and Occurrence Not Detected watersheds." All tables under Impact BIO-2, including Table 3.4-17, have been revised per the August 2013 Biological Assessment. The revisions to the tables and text are shown in **Chapter 3.0, Errata**.

3.0 ERRATA

3.1 INTRODUCTION

This chapter shows revisions to the Draft EIS, subsequent to the document's publication and public review. The changes shown in this section are a result of the comments received from the USEPA and the Applicant, or because of consultation with the U.S. Fish and Wildlife Service (USFWS) to review the impacts of the Proposed Action on federally listed species as well as the draft mitigation plan put forth by the Applicant, or project description changes.

The revisions are presented in the order in which they appear in the Draft EIS and are identified by page number in respective chapters. These revisions are shown as excerpts from the Draft EIS. Strikethrough (~~strikethrough~~) text indicates deletions and underlined (<u>underlined</u>) text indicates additions.

3.2 REVISIONS TO THE DRAFT EIS

ES Executive Summary

The text of the Executive Summary on Draft EIS page ES-2 has been revised as follows to explain why the Off-Site Alternative is evaluated in the Draft EIS as within the jurisdiction of the City of Roseville.

All of the alternatives evaluated in this EIS would also develop a similar moderate-scale, mixed-use, mixed-density, master-planned community either on the project site (Alternatives 1 through 5) or on an alternative site (Off-Site Alternative) near Roseville. <u>Although the Off-Site Alternative is located in unincorporated Placer County, it is adjacent to the Roseville city limit and has been considered in the past for annexation to the City. In addition, due to the proximity of this site to existing neighborhoods in Roseville, some of the public services would be best provided to this site by the City of Roseville. Therefore, for purposes of analysis in this EIS, the Off-Site Alternative is assumed to be a site that would be subject to City approval and a subsequent annexation action.</u>

As with the Proposed Action, other than the widening of an existing bioswale, no other off-site improvements are required for any of the on-site alternatives. The Off-Site Alternative would, however, require off-site infrastructure improvements which include two storm drains and storm water detention basins in the area to the west of the alternative site; a 24-inch and an 18-inch wastewater lines that would extend off-site to the west and connect to a new 36-inch main that would carry wastewater into an existing 48-inch main that would convey the wastewater to the Pleasant Grove Wastewater Treatment Plant; and recycled water lines that would connect the alternative site to existing recycled water lines to the east and south of the alternative site.

Table ES-1 on Draft EIS page ES-3 is revised as follows:

Table ES-1
Proposed Action and Alternatives – Acreages by Land Use and Potential Waters of the U.S. Impacts

Alternative	Development Footprint	Residential Acreage	Residential Units at Buildout	Other Development Acreage		Open Space Acreage	Potential Impacts on Aquatic Resources[1]
Proposed Action	361	245	2,029	Commercial	43	36	9.61 (2.98 acres preserved)
				Public/Quasi-Public	11		
				Parks	16		
				Roads[2]	46		
No Action	275	177	~~1,412~~1,505	Commercial	30	122	0 (12.55 acres preserved)
				Public/Quasi-Public	12		
				Parks	14		
				Roads[2]	44		
Reduced Footprint/ Increased Density	267	153	1,890	Commercial	40	130	3.10 (9.47 acres preserved)
				Public/Quasi-Public	12		
				Parks	16		
				Roads[2]	47		
Reduced Footprint/ Same Density	267	158	1,405	Commercial	40	130	3.10 (9.47 acres preserved)
				Public/Quasi-Public	12		
				Parks	11		
				Roads[2]	47		
Central Preserve	271	162	1,415	Commercial	40	126	~~5.05~~5.0 3 (~~7.52~~7.51 acres preserved)
				Public/Quasi-Public	11		
				Parks	12		
				Roads[2]	~~35~~46		
One Acre Fill	236	140	1,340	Commercial	23	161	~~0.94~~0.92 (11.63 acres preserved)
				Public/Quasi-Public	12		
				Parks	13		
				Roads[2]	49		
Half Acre Fill	223	129	1,256	Commercial	19	174	0.47 (12.08 acres preserved)
				Public/Quasi-Public	13		
				Parks	13		
				Roads[2]	50		
Off-Site	346	179	1,560	Commercial/ Industrial	80	~~60~~61	11.92[3] (3.9 acres preserved)
				Public/Quasi-Public	12		
				Parks	14		
				Roads[2]	~~43~~61		

[1] *Preliminary estimate based on land use plans and existing information on wetlands and other jurisdictional waters on the project site. Acres of aquatic resources preserved under the alternative are reported in parentheses.*
[2] *Includes the area of major roads and landscape corridors.*
[3] *This alternative would also fill an additional ~~0.3~~ 0.02 acre of the waters of the U.S. off-site in association with the construction of the off-site infrastructure improvements ~~for a total impact of about 6.5 acres~~.*

The last sentence of the second full paragraph on Draft EIS page ES-5 is revised as follows:

Available ~~M~~mitigation measures ~~is proposed that~~ would partially mitigate the light and glare effect but not to a less than significant level.

The last sentence on Draft EIS page ES-5 is revised as follows:

Available ~~M~~mitigation measures ~~is proposed that~~ would fully mitigate the effect related to PM10 emissions and partially mitigate the effect related to ROG emissions but not to a less than significant level.

The last sentence of the end of the first paragraph on Draft EIS page ES-6 is revised as follows:

Available ~~M~~mitigation measures ~~is proposed that~~ would partially mitigate this effect but not to a less than significant level.

The first sentence of the third paragraph on Draft EIS page ES-6 is revised as follows:

Available ~~M~~mitigation measures ~~is proposed that~~ would partially mitigate the amount of emissions generated by the Proposed Action and all alternatives.

The last sentence in the paragraph under Climate Change on Draft EIS page ES-6 is revised as follows:

Available ~~M~~mitigation measures ~~is proposed that~~ would partially mitigate this effect but not to a less than significant level.

The last sentence of the first paragraph on Draft EIS page ES-7 is revised as follows:

Available ~~M~~mitigation measures ~~is proposed that~~ would partially mitigate this effect but not to a less than significant level.

The last sentence of the second paragraph on Draft EIS page ES-7 is revised as follows:

Available ~~M~~mitigation measures ~~is proposed that~~ would fully mitigate the effect to on-site receptors, and would partially mitigate this effect on off-site receptors but not to a less than significant level.

The third to last sentence of the third paragraph on Draft EIS page ES-7 is revised as follows:

Available ~~M~~mitigation measures ~~is proposed that~~ would partially mitigate the impact related to exterior noise levels.

The second sentence under Transportation and Traffic on Draft EIS page ES-7 is revised as follows:

Available ~~M~~mitigation measures ~~is proposed that~~ would require that the Applicant to pay the project's fair share of the cost of necessary improvements to the affected intersections and roadway segments by paying traffic impact fees.

The second sentence in the last paragraph on Draft EIS page ES-7 is revised as follows:

Available ~~M~~mitigation measures ~~is proposed to~~ would reduce effects on affected state highway segments.

The last sentence of the second paragraph on Draft EIS page ES-8 is revised as follows:

Available ~~M~~mitigation measures ~~is proposed that~~ would partially mitigate this effect but not to a less than significant level.

The first paragraph of Mitigation Measure BIO-1a on Draft EIS page ES-21 is revised as follows:

Prior to the approval of the Record of Decision for the Proposed Action, in order to mitigate for the unavoidable loss of wetlands and other waters of the U.S., the Applicant shall develop a compensatory mitigation and monitoring plan that will consist of ~~restoration or and establishment of aquatic resources on the project site and~~ purchase of vernal pool and seasonal wetlands creation/restoration credits, and/or provide permittee-responsible restoration at an off-site location. This plan shall be implemented prior to or concurrent with the occurrence of impacts. The mitigation and monitoring plan shall include plans for the restoration or establishment of aquatic habitat to adequately offset and replace the aquatic functions and services that would be lost within the project area, and contain an adequate margin of safety to reflect anticipated success, as well as identify any off-site locations proposed for compensatory mitigation and/or identify the mitigation bank proposed to be used and the credits of each habitat type proposed to be purchased. Any mitigation bank proposed to be used ~~shall be located within Placer County and~~ shall include the project site within its service area. In addition, in order to reduce cumulative impacts within the area, the Applicant shall attempt to identify and utilize a mitigation bank located within the same watershed as the proposed impacts. The submitted mitigation and monitoring plan shall include the mitigation location and design drawings, vegetation plans, including target species to be planted, and final success criteria, and shall ~~be presented in the format~~meet the standards of current guidance and regulations (e.g., USACE Sacramento District's "Habitat Mitigation and Monitoring Proposal Guidelines," dated December 30, 2004, USACE regulations at 33 CFR 332, etc.). The compensatory mitigation plan shall ensure no net loss of wetland functions and services of all aquatic resources that would be removed, lost, and/or degraded as a result of implementing the proposed project or any alternative.

The last paragraph of Mitigation Measure BIO-1b on Draft EIS page ES-22 is revised as follows:

Within the Record of Decision for the Proposed Action, the USACE shall document its determination on whether any required on-site preservation or any proposed off-site preservation is an appropriate method of compensatory mitigation to offset unavoidable impacts to aquatic resources on the project site. If the USACE determines that preservation of on-site or off-site aquatic resources is appropriate to utilize as compensatory mitigation, the USACE will determine the amount and type of preservation required to ensure no net loss of aquatic resource functions and services, based on a number of factors, including the functions of the resources being impacted, the difficulty of replacing the specific resource, uncertainty and risk of failure, indirect impacts and temporal loss. Any approval of a long-term management plan by the USACE shall include requirements for site protection, the implementation of appropriate financial assurances and monitoring of the preserve areas in accordance with applicable regulations and guidance. The use of an approved mitigation bank that includes the project site within its service area would satisfy the mitigation requirements.

The enforcement of Mitigation Measure BIO-4 on Draft EIS page ES-24 is hereby revised as follows:

Enforcement: U.S. Fish and Wildlife Service; California Department of Fish and Wildlife; City of Roseville Planning Department upon annexation

The enforcement of Mitigation Measure BIO-5 on Draft EIS page ES-25 is hereby revised as follows:

Enforcement: U.S. Fish and Wildlife Service; California Department of Fish and Wildlife; City of Roseville Planning Department upon annexation

The impact conclusion for Impact BIO-6 is revised as follows and Mitigation Measure BIO-6 on Draft EIS page ES-26 is deleted.

Impact BIO-6: Effects on State Special-Status Plant and Wildlife Species	LTS~~(m)~~	LTS~~(m)~~	LTS~~(m)~~	LTS~~(m)~~
~~Mitigation Measure BIO-6: Relocate Western Spadefoot Toad (Applicability – No Action, Proposed Action, and All Alternatives)[1]~~ ~~The location of pools that are occupied by western spadefoot toad shall be determined through surveys conducted during the appropriate season (generally February) by a qualified biologist. Those pools that are found to support western spadefoot toad shall be avoided if feasible. If avoidance is not feasible, the CDFW[2] shall be consulted for its recommendation with respect to an adult or larval or egg masses capture and relocation plan.~~ ~~Timing: Before the approval of any grading, improvement, or construction plans and before any ground disturbing activity in any project development phase that contains vernal pools or other seasonal wetland habitats.~~ ~~Enforcement: City of Roseville Planning Department~~				

The third bullet point under Mitigation Measure CR-1b on Draft EIS page ES-36 is revised as follows:

- *Once the inventory is complete, the USACE ~~(or designee, as directed by the USACE)~~ shall prepare a ~~Finding~~Determination of Effect ~~(FOE)~~ to assess the effect of the buildout of the individual development phase upon identified historic properties by applying the Criteria of Adverse Effect pursuant to 36 CFR 800.5(a) (1). If the ~~FOE~~USACE identifies adverse effects, the Applicant shall prepare treatment measures and protocols to minimize these impacts to the extent ~~possible~~feasible. These treatment measures shall be appended to the PA in a treatment plan prepared for the specific project development phase. Treatment measures may include, but are not limited to, avoidance and preservation in places where ~~possible~~feasible. Where avoidance is not ~~possible or~~ feasible, treatment shall consist of either: (1) recovery of a suitable sample of material from archaeological sites that have the potential to contribute to research, and/or (2) documentation of historic resources to capture their significance and relationship to important historical themes, complexes, or landscape setting. Documentation of historical resources shall be performed according to the Historic American Building Survey or Historic American Engineering Record (HABS/HAER) specifications or an equivalent standard when existing architecture or engineered features are subject to adverse effects. Where appropriate, treatment plans may specify the preparation and circulation of interpretive brochures, narrative descriptions, and photographic documentation for the general public.*

Mitigation Measure NOISE-2b on Draft EIS page ES-43 is deleted as shown below:

~~**Mitigation Measure NOISE-2b: Attenuate Park Noise**~~

~~***(Applicability – No Action, Proposed Action, and All Alternatives)***~~

- ~~*Activities at the proposed community-wide park shall be scheduled to occur during daytime hours (7:00 AM to 10:00 PM).*~~
- ~~*Public address (PA) systems shall be designed, installed, and tested to comply with the requirements of the City of Roseville Municipal Code Noise Ordinance at the nearest sensitive receptors.*~~
- ~~*Wood fencing, or 160-foot (49 meters) setbacks adjacent to active recreation areas, shall be included in the project design where neighborhood parks abut residential uses.*~~

The last bullet under Mitigation Measure NOISE-3 on Draft EIS page ES-44 has been deleted as it does not apply to Westbrook project:

- ~~*Tentative map applications for residential uses located along Fiddyment Road shall be required to include an analysis of interior noise levels. The report shall be prepared by a qualified acoustical engineer and shall specify the measures required to achieve compliance with the City of Roseville 45 dB Ldn interior noise level standard.*~~

Mitigation Measure TRA-1 on Draft EIS page ES-46 is revised as follows:

Mitigation Measure TRA-1: **Pay fair share of the improvements to City of Roseville intersections**
(*Applicability – No Action, Proposed Action, and All Alternatives*)

Pay Fair Share of Improvements in the CIP including improvements to the following intersections:

- *Fiddyment/Baseline Road: improve intersection as part of the project*

- *Watt Avenue/Baseline Road: improve intersection as part of the project*
- *Baseline Road: widen to four-lane facility from Fiddyment Road to western Specific Plan Boundary.*

Improvements would be necessary to the following intersections, as part of the project to achieve acceptable service levels under the 2025 CIP plus Project scenario. However, as noted, many intersections cannot be mitigated because of constraints.

1. *Foothills Boulevard and Baseline Road: No feasible mitigation*
2. *Industrial Avenue and Alantown Drive: No feasible mitigation*
3. *Cirby Way and Northridge Drive: No feasible mitigation*
4. *Foothills Boulevard and Junction Boulevard: No feasible mitigation*
5. *Junction Boulevard and Baseline Road: No feasible mitigation*
6. *Roseville Parkway and Sierra College Boulevard: No feasible mitigation*
7. *Blue Oaks Boulevard and Crocker Ranch Road: Re-stripe to include two south bound to east bound left turn lanes and a separate right turn. This improvement will be added to the City of Roseville's Capital Improvement program. Development within the ~~Sierra Vista Specific Plan Area~~Westbrook project area will be required to pay fair share costs for this improvement*
8. *Blue Oaks Boulevard and New Meadow Drive: Re-stripe the southbound through lane to a shared through and left-turn lane. This improvement will be added to the City of Roseville's Capital Improvement program. Development within the ~~Sierra Vista Specific Plan Area~~Westbrook project area will be required to pay fair share costs for this improvement. As such, this impact would be reduced to less than significant.*
9. *Foothills Boulevard and Baseline/Main: No feasible mitigation*
10. *Sunrise Boulevard and Sandringham/Kensington: add a dedicated southbound right-turn lane*
11. *Woodcreek Oaks and Baseline Road: construction of a second eastbound through lane. This improvement is currently in the City's CIP program. ~~SVSP~~Westbrook project would be required to pay fair share costs for this improvement.*

The ~~SVSP~~Westbrook project will develop over a period of several years. Therefore, the impacts on these intersections would occur over a period of time. As with other improvements in the 2025 CIP, the City will monitor traffic conditions and determine when specific improvements are needed. The City of Roseville's traffic impact fees should be revised to include the ~~SVSP~~Westbrook project area. Specific Plans and/or development proposals shall provide for fair share contributions of the cost of the improvements through the updated traffic impact fees.

Construction of intersection improvements could have impacts on biological and cultural resources, air quality, water quality, and noise levels. These impacts will be evaluated as part of the CIP update to incorporate the adopted mitigation.

1.0 Introduction

The footnote on Draft EIS page 1.0-5 is revised as follows:

[1] Data regarding large-scale master-planned communities that were approved in Placer County (jurisdictions of Roseville, Lincoln, Rocklin, and unincorporated Placer County) between 1990 and 2007 were documented in a

memo dated August 15, 2007 prepared the law offices of Sandberg, Lo Duca & Aland, LLP. Of the 12 projects that were approved, the largest was 5,230 acres in size while the smallest was 909 acres. Development projects proposed in western Placer County since 2007 include Creekview SP which involves a site of 748 acres; Regional University ~~and Community~~ Specific Plan which involves a site of 1,157 acres; and Brookfield SP which involves a site of 1,350 acres. Based on these data, the USACE determined that a large-scale development project is at least 1,000 acres.

2.0 Project Description

The last sentence of sentence of the last paragraph under Section 2.4 Proposed Action on Draft EIS page 2.0-6 is revised as follows:

Lands to the west of the site are located within the Curry Creek Community Plan area, an area for which no development plans have been put forth and the Regional University Specific Plan, an area for which Placer County approved a specific plan in ~~2009~~2008.

Figure 2.0-3, which shows the open space preserve, has been revised to remove the floodplain storage area previously proposed on the project site.

The second paragraph under Open Space on Draft EIS page 2.0-9 is revised as follows:

The open space on the project site would comprise approximately 34.4 acres (13.9 hectares) of primary open space and about 1.4 acres (0.6 hectare) of secondary open space. Primary open space areas are those portions of the 35.8-acre (14.5-hectare) open space area where minimal grading or land disturbance would occur. The primary open space also includes the areas adjacent to the two intermittent drainages within the open space area. ~~Some grading would occur in these areas to create new compensatory wetlands and a basin to provide a floodplain expansion area.~~ The primary open space areas would be put under conservation easements prior to commencement of construction on the Proposed Action. With respect to the secondary open space, this includes open space that is immediately adjacent to the area to be developed to the south and therefore would be subject to development-related grading and filling. Once these grading and filling activities are completed, the secondary open space area would be placed under conservation easements.

The information on page 2.0-10 is revised to remove reference to the floodplain detention area as follows:

Depending on permit terms and conditions, the Applicant expects to conduct the following types of activities in open space areas consistent with the City of Roseville's O&M Plan: maintenance of a 30-foot (9-meter) fire control strip (on the southern portion of the open space only within the secondary open space), maintenance of the trail, and minimal maintenance of the bio-swale ~~and floodplain detention area~~.

~~**Floodplain Expansion Area**~~

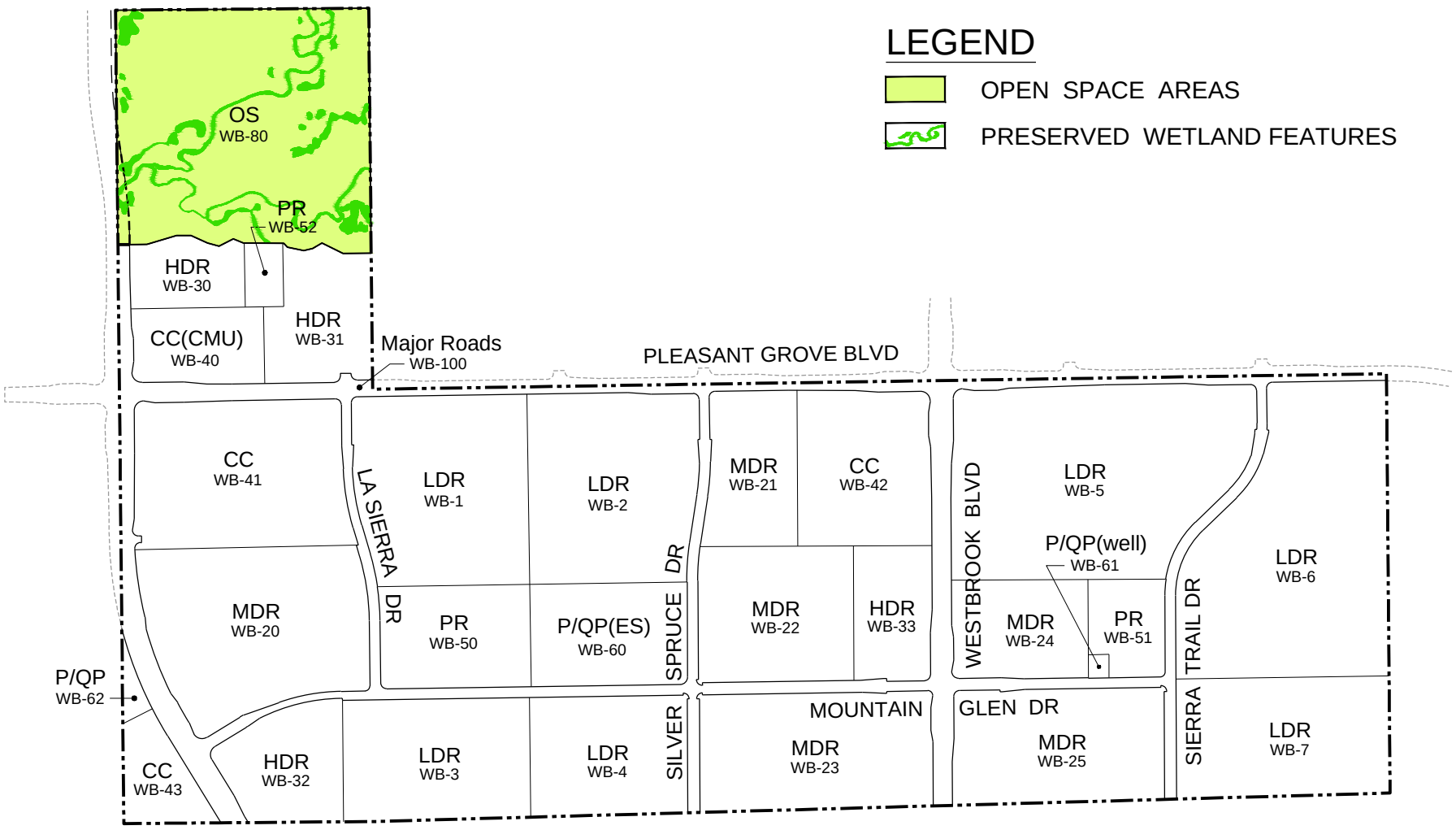
~~The Applicant is proposing to make improvements to the proposed open space preserve to increase its capacity for detaining 100-year flood flows. In order to satisfy post-project on-site detention requirements, a total of 98 acre-feet (12 hectare-meters) of water must be detained on site during projected 100-year flood conditions. Under existing (baseline) conditions, approximately 80 acre-feet (10 hectare-meters) of water is detained on-site during a projected 100-year frequency flood event. This~~

~~detention is a result of a restricted outlet (culvert) at the western property boundary and the existing topography. In order to increase detention, the Applicant is proposing to excavate an existing area of upland grassland to provide the additional 18 acre-feet (2 hectare-meters) of storage.~~

~~A 3.72-acre (1.28-hectare) area located along the northern side of the existing intermittent stream channel would be excavated 0 to 6 feet (0 to 2 meters), depending on existing topography. This area was selected because it does not contain any existing aquatic resources. The area would be excavated no lower than the existing top of bank of the intermittent channel and would be sloped so that it has positive drainage (i.e., it would not be a concave surface that could act to pond water). The improvements would be conducted concurrently with the wetland mitigation construction. Approximately 4 inches (10 centimeters) of topsoil within the floodplain expansion area would first be salvaged and temporarily stockpiled. The floodplain expansion area would then be excavated to its approximate design depth. Following excavation, the salvaged topsoil would be re-applied and graded to foster restoration of the grasslands. Following completion of the grassland restoration, the floodplain expansion area would be managed by the City along with the other portions of the preserve consistent with the approved City of Roseville O&M Plan. The floodplain expansion area will be designed so that the City of Roseville will not need to conduct ongoing maintenance once the area is built and restored.~~

The third paragraph under Storm Water Drainage on page 2.0-13 is revised to remove reference to the floodplain detention area as follows:

To comply with the requirements of the City of Roseville with respect to storm water detention and flood control, based on the proposed development plan, approximately 18 acre-feet (2 hectare-meters) of storm water detention capacity would be needed. ~~This would be provided in the northwestern open space area in the form of created wetlands and a floodplain expansion area. These wetlands and floodplain expansion area would be located adjacent to the two intermittent streams that traverse the open space area and would be created by excavating shallow depressions. The Applicant proposes to use the created wetlands to partially mitigate the Proposed Action's impacts on waters of the U.S.~~



NOT TO SCALE

SOURCE: Impact Sciences, Inc. – October 2013

FIGURE **2.0-3**

Proposed Action Open Space Preserve

The third paragraph under Construction Activities on Draft EIS page 2.0-16 is revised as follows:

Construction activities for residential and commercial uses would be similar to those required for any development project. They would include site preparation (vegetation removal), grading (excavation and fill placement to create building pads), foundation construction, construction of structures, roofing, finishing, paving, and landscaping. A variety of heavy equipment—such as excavators, graders, scrapers, concrete trucks, and forklifts—would be required, as well as power and hand tools.

~~Construction activities in the open space area proposed for wetland creation and floodplain storage would focus on grading to create the appropriate elevations for wetland inundation and floodplain storage, followed by reestablishment of grassland vegetation.~~

Development of the master planned community envisioned under the Westbrook project would be a long-term undertaking. If authorized, construction would begin in 2013 and, depending on market conditions, would be completed by about 2035.

Figure 2.0-4, which shows the proposed drainage improvements, has been revised to remove the floodplain storage area previously proposed on the project site.

Figure 2.0-5, which shows the existing bioswale, has been revised to show the widening of the bioswale.

The first full paragraph on Draft EIS page 2.0-19 is revised to remove reference to the floodplain storage previously proposed on the project site:

As a result of the reduction in community size, the utility demand of this alternative would be lower. **Table 2.0-3** presents the estimated utility demand for this and other alternatives discussed below. As with the Proposed Action, additional storm water detention capacity would be required (about 14 acre-feet under the No Action alternative compared to 18 acre-feet for the Proposed Action) ~~which would require the construction of a floodplain expansion area near the project site creeks~~ <u>which would be provided in the West Roseville Specific Plan area and the existing bioswale adjacent to the project site</u>. As with the Proposed Action, no off-site improvements other than the widening of the existing bioswale would be required.

The information regarding water detention capacity under Section 2.5.2 Reduced Footprint/Increased Density Alternative on Draft EIS page 2.0-21 is revised as follows:

Acreage designated for commercial uses would be reduced slightly under this alternative and school acreage would remain the same. The location of roadways and commercial land uses would be largely similar to the Proposed Action, with Mountain Glen Drive and Sierra Trail Drive somewhat more curved to avoid open space areas. **Figure 2.0-7** presents the proposed land use plan for this alternative. **Table 2.0-3** presents the estimated utility demand for this alternative. As with the Proposed Action, additional storm water detention capacity would be required (about 13 acre-feet [1.6 hectare-meters] under this alternative compared to 18 acre-feet [2.2 hectare-meters] for the Proposed Action) ~~which would require the construction of a floodplain expansion area near the project site creeks~~ <u>which would be provided in the West Roseville Specific Plan area and the existing bioswale adjacent to the project site</u>. As with the Proposed Action and all the other on-site alternatives, no off-site improvements other than the widening of the existing bioswale would be required.

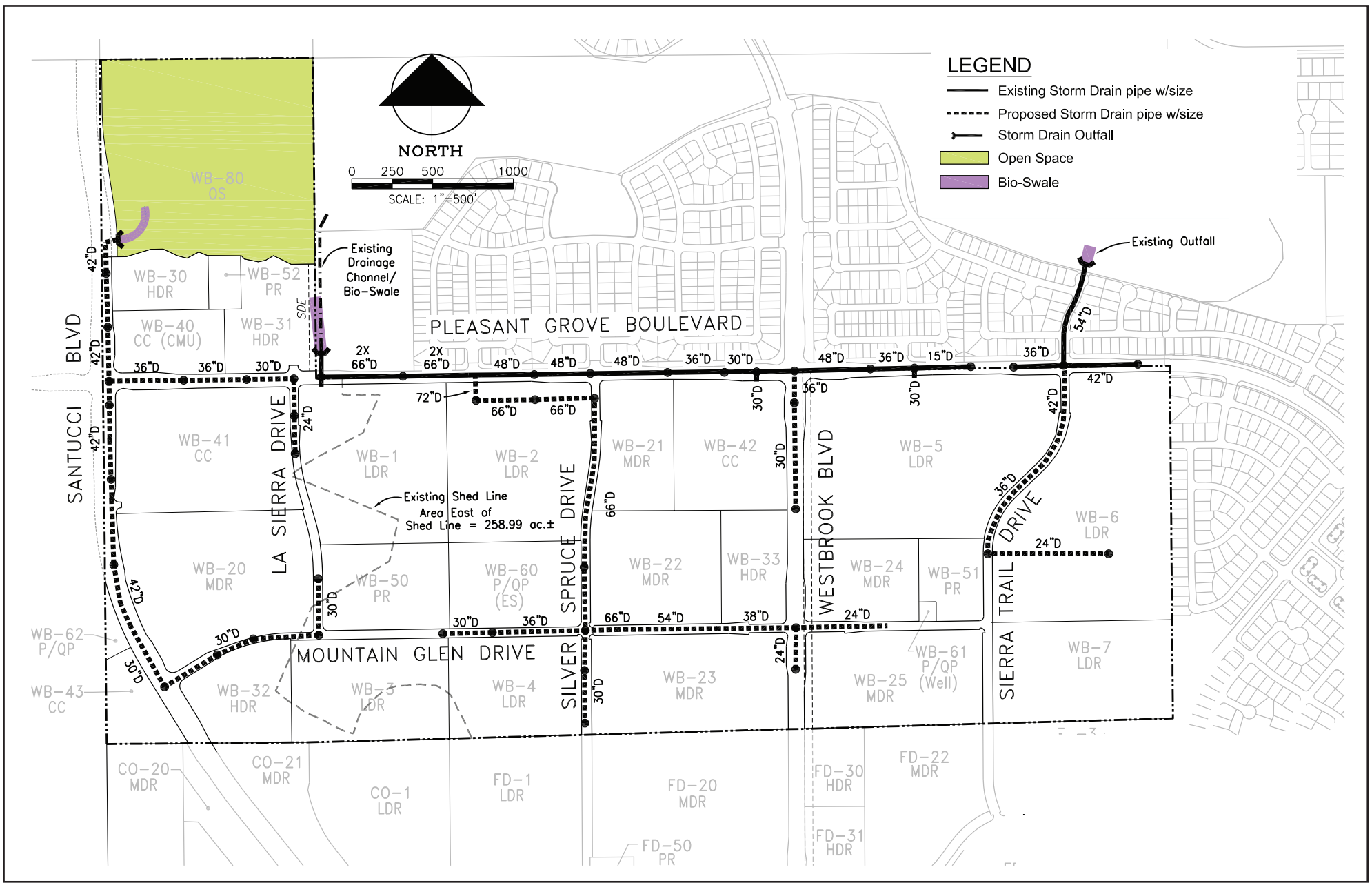
The information regarding water detention capacity in the second paragraph under Section 2.5.3 Reduced Footprint/Same Density Alternative on Draft EIS page 2.0-21 is revised as follows:

However, unlike the alternative described above, under this alternative, residential areas would be developed at the same densities as the Proposed Action. As a result, this alternative would provide 1,405 residential units, compared to 2,029 units under the Proposed Action. Acreage designated for commercial uses would be reduced slightly under this alternative by comparison with the Proposed Action and school acreage would remain the same. The location of roadways and commercial land uses would be largely similar to the Proposed Action, with Mountain Glen Drive and Sierra Trail Drive somewhat more curved to avoid open space areas. **Figure 2.0-8** presents the proposed land use plan for this alternative. **Table 2.0-3** presents the estimated utility demand for this alternative. As with the Proposed Action additional storm water detention capacity would be required (about 13 acre-feet [1.6 hectare-meters] under this alternative compared to 18 acre-feet [2.2 hectare-meters] for the Proposed Action) ~~which would require the construction of the floodplain expansion area near the project site creeks~~ which would be provided in the West Roseville Specific Plan area and the existing bioswale adjacent to the project site. As with the Proposed Action and all the other on-site alternatives, no off-site improvements other than the widening of the existing bioswale would be required.

Text on Draft EIS page 2.0-22 under Section 2.5.4 Central Preserve Alternative is revised as follows to reflect the changes in acreage of fill and the on-site flood retention:

2.5.4 Central Preserve Alternative

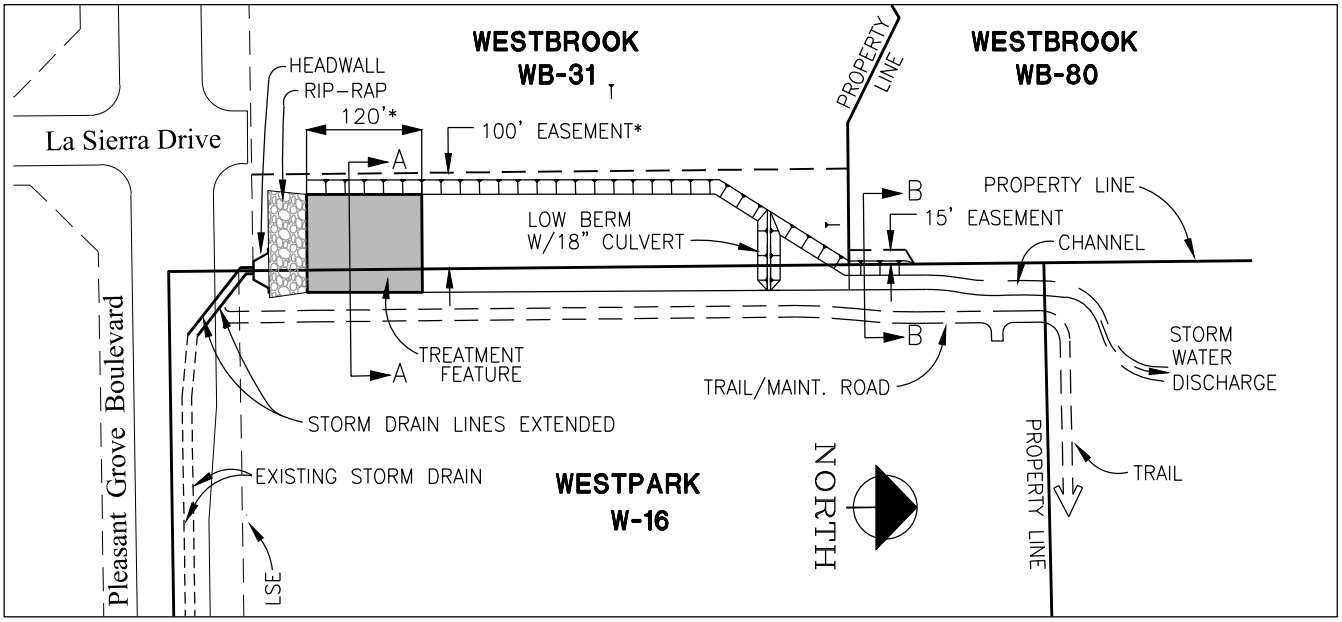
This alternative would reduce the footprint of development within the site by concentrating additional open space in a contiguous area that runs roughly north-south through the center of the site and expands the open space area in the northwest portion of the site. Based on its design, this alternative would fill about ~~5.05~~5.03 acres (2.04 hectares) and preserve ~~7.52~~7.51 acres (3.04 hectares) of aquatic resources on the project site. Under this alternative, total acreage to be developed would be reduced 25 percent to 271 acres (110 hectares), compared to 361 acres (146 hectares) under the Proposed Action, and open space would increase to 126 acres (51 hectares), compared to 36 acres (15 hectares) under the Proposed Action. The residential development footprint would decrease to 162 acres (66 hectares), compared to 245 acres (99 hectares) under the Proposed Action. As residential densities would remain similar to the Proposed Action, the total number of residential units under this alternative would be about 1,415. Acreage designated for commercial and school uses would be similar to the Proposed Action under this alternative. The location of roadways and commercial land uses would be largely similar to the Proposed Action, with Mountain Glen Drive and Sierra Trail Drive somewhat more curved to avoid open space areas. **Figure 2.0-9** presents the proposed land use plan for this alternative. **Table 2.0-3** presents the estimated utility demand for this alternative. As with the Proposed Action, additional storm water detention capacity would be required (about 14 acre-feet [1.7 hectare-meters] under this alternative compared to 18 acre-feet [2.2 hectare-meters] for the Proposed Action) ~~which would require the construction of a floodplain expansion area near the project site creeks~~ which would be provided in the West Roseville Specific Plan area and the existing bioswale adjacent to the project site. As with the Proposed Action and all the other on-site alternatives, no off-site improvements other than the widening of the existing bioswale would be required.



SOURCE: MacKay & Somps – October 2013

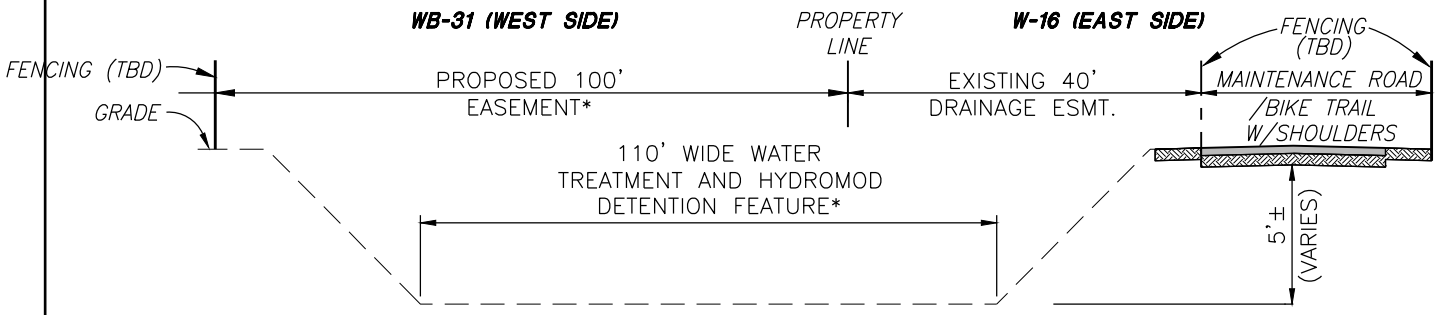
FIGURE **2.0-4**

Proposed Drainage Improvements



PLAN VIEW: WB-31 WATER QUALITY TREATMENT CHANNEL

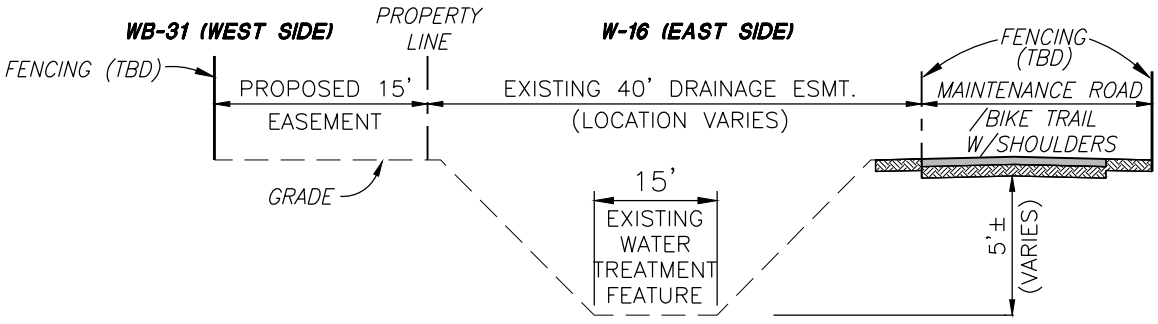
* ACTUAL WIDTH TO BE DETERMINED WITH FINAL DESIGN



SECTION A-A

NTS

* ACTUAL WIDTH TO BE DETERMINED WITH FINAL DESIGN



SECTION B-B

NTS

SOURCE: McKay & Somps, October 2013

FIGURE **2.0-5**

Storm Water Channel Plan

Text on Draft EIS page 2.0-22 under Section 2.5.5 One Acre Fill Alternative is revised as follows to reflect the changes in acreage of fill and the on-site flood retention:

2.5.5 One Acre Fill Alternative

Under the One Acre Fill Alternative, areas on the project site containing waters of the U.S. would be preserved as open space such that no more than 1 acre (0.4 hectare) of jurisdictional waters would be filled to build the land development under this alternative and the vast majority of the project site aquatic resources (11.63 acres [4.71 hectares]) would not be filled. This would reduce the development footprint to about 236 acres (96 hectares), compared to 361 acres (146 hectares) under the Proposed Action. The proposed residential densities under this alternative are greater than the densities included in the Proposed Action. However, due to the reduced footprint of development, the total residential development would be reduced to 1,340 dwelling units, compared to 2,029 units under the Proposed Action. Land designated for commercial uses would be about 23 acres (9 hectares) compared to 43 acres (17 hectares) under the Proposed Action. School acreage would remain the same as under the Proposed Action. Open space acreage would increase from about 36 acres (15 hectares) under the Proposed Action to about 161 acres (65 hectares) under this alternative. The alignments of Mountain Glen Drive, Silver Spruce Drive, and Sierra Trail Drive would be substantially different from the alignments of these roadways under the Proposed Action. This alternative would also include a bridge along a portion of Silver Spruce Drive. **Figure 2.0-10** presents the proposed land use plan for this alternative. **Table 2.0-3** presents the estimated utility demand for this alternative. As with the Proposed Action, additional storm water detention capacity would be required (about 12 acre-feet [1.5 hectare-meters] under this alternative compared to 18 acre-feet [2.2 hectare-meters] for the Proposed Action) ~~which would require the construction of a floodplain expansion area near the project site creeks~~ which would be provided in the West Roseville Specific Plan area and the existing bioswale adjacent to the project site. As with the Proposed Action and all the other on-site alternatives, no off-site improvements other than the widening of the existing bioswale would be required.

Text on Draft EIR page 2.0-27 under Section 2.5.6 Half Acre Fill Alternative is revised as follows to reflect the changes in acreage of fill and the on-site flood retention:

2.5.6 Half Acre Fill Alternative

Under the Half Acre Fill Alternative, areas on the project site containing wetland resources would be preserved as open space such that no more than 0.5 acre (0.2 hectare) of jurisdictional waters would be filled to build the planned community under this alternative. Based on its design, this alternative would fill about 0.47 acre (0.19 hectare) and preserve 12.08 acres (4.89 hectares) of aquatic resources on the project site.

This alternative would reduce the development footprint to about 223 acres (90 hectares), compared to 361 acres (146 hectares) under the Proposed Action. As with the One Acre Fill Alternative above, the proposed residential densities under this alternative are greater than the densities included in the Proposed Action. However, due to the reduced footprint of development, the total number of residential

units would be reduced to 1,256 dwelling units, compared to 2,029 units under the Proposed Action. Land designated for commercial uses would be about 19 acres (8 hectares) compared to 43 acres (17 hectares) under the Proposed Action. Acreage for school uses would be largely the same as under the Proposed Action. Open space acreage would increase from about 36 acres (15 hectares) under the Proposed Action to about 174 acres (70 hectares) under this alternative. The alignments of Mountain Glen Drive, Silver Spruce Drive, and Sierra Trail Drive would be substantially different from the alignments of these roadways under the Proposed Action. This alternative would also include a bridge along a portion of Silver Spruce Drive. **Figure 2.0-11** presents the proposed land use plan for this alternative. **Table 2.0-3** presents the estimated utility demand for this alternative. As with the Proposed Action, additional storm water detention capacity would be required (about 11 acre-feet [1.4 hectare-meters] under this alternative compared to 18 acre-feet [2.2 hectare-meters] for the Proposed Action) ~~which would require the construction of a floodplain expansion area near the project site creeks~~ which would be provided in the West Roseville Specific Plan area and the existing bioswale adjacent to the project site. As with the Proposed Action and all the other on-site alternatives, no off-site improvements other than the widening of the existing bioswale would be required.

The description under Section 2.5.7 Off-Site Alternative (Placer Ranch Site) on Draft EIS page 2.0-27 is revised as follows:

2.5.7 Off-Site Alternative (Placer Ranch Site)

This is an off-site alternative that would construct the Westbrook project on an approximately 406-acre (164-hectare) portion of the Placer Ranch Specific Plan site located approximately 3.5 miles (5.6 kilometers) to the northwest of the project site within unincorporated Placer County. Although the Off-Site Alternative is located in unincorporated Placer County, it is adjacent to the Roseville city limit and has in the past been considered for annexation to the City. In addition, some of the public services would be best provided to this site by the City of Roseville due to its proximity to existing neighborhoods in Roseville. Therefore, for purposes of analysis in this EIS, the Off-Site Alternative is assumed to be a site that would be subject to City approval and a subsequent annexation action. Under the Off-Site Alternative, approximately 6.2 acres (2.5 hectares) of jurisdictional waters would be filled and 3 acres (1.2 hectares) of aquatic resources on the alternative site would be preserved. In addition, the alternative would involve the filling of about 5.72 acres of wetlands off-site associated with on-site development and construction of infrastructure, for a total of 11.92 acres (4.81 hectares).

The Placer Ranch site is bounded by the Roseville City limit to the south, and is located west of light industrial uses along Industrial Avenue. The alternate site is primarily outside of the 1-mile (1.6-kilometer) County-defined Western Regional Landfill buffer area within which development is restricted to non-residential uses. The total development footprint of 346 acres (140 hectares) would comprise 179 acres (72 hectares) of residential uses (1,560 units at buildout), 35 acres (14 hectares) of commercial and office uses, 45 acres (18 hectares) of industrial uses, 10 acres (4 hectares) of schools, 14 acres (6 hectares) of parks, and ~~43~~ 61 acres (~~17~~ 25 hectares) of roads. **Figure 2.0-12** presents the proposed land use plan for this alternative. The industrial uses would be located in the southern portion

of the site in an area where other land uses cannot be placed due to the presence of a peaking power plant. About 60 acres (24 hectares) would be preserved as open space. As shown in the figure, due to its location in an industrial area, this alternative includes a 100-foot (30-meter) buffer along the northern and eastern boundary to separate the on-site residential uses from the adjacent industrial uses. **Figure 2.0-13** presents the storm drainage infrastructure corridor for this alternative and **Figure 2.0-14** presents the wastewater infrastructure corridor for this alternative.

Table 2.0-3 presents the estimated utility demand for this alternative. A number of off-site utility improvements will be necessary to construct the proposed master planned community at this site. These include two storm drains and storm water detention basins in the area to the west of the alternative site; a 24-inch (61-centimeter) and an 18-inch (46-centimeter) wastewater lines that would extend off-site to the west and connect to a new 36-inch (91-centimeter) main that would carry wastewater into an existing 48-inch (122-centimeter) main that would convey the wastewater to the PGWWTP. With respect to potable and recycled water, service to the site would be provided via two new 16-inch (41-centimeter) water lines and recycled water lines that would connect to existing water and recycled water lines to the east and south of the alternative site. The entire 2,250-acre (910-hectare) Placer Ranch Specific Plan site has previously been proposed for development of 6,793 residential dwelling units, 527 acres (213 hectares) of business park and light industrial uses, 150 acres (61 hectares) of office uses, 99 acres (40 hectares) of commercial uses, and a 300-acre (121-hectare) branch campus for the California State University, Sacramento. The Placer Ranch SP project was originally proposed in the County. A development application was submitted to the City of Roseville in 2007, but the project ~~has been~~ was put on hold ~~since early 2008 and is no longer being pursued~~. [1]

The last sentence of the first paragraph under Section 2.6.3 Regional University on Draft EIS page 2.0-34 is revised as follows:

The Placer County Board of Supervisors ~~considered~~approved the proposed Regional University ~~SP~~Specific Plan in 2008.

The last sentence of the first paragraph under Section 2.6.4 Curry Creek on Draft EIS page 2.0-34 is revised as follows:

The County Board of Supervisors directed staff to proceed with studying the area for future development in 2003, but at this time there is no proposed or adopted community plan, specific plan, or formal development application for the site.

1 Since publication of the Draft EIS, the site was purchased by Westpark Communities. Discussions with the City of Roseville and Placer County have been reinitiated regarding development on the site.

The second sentence under Section 2.6.6 Dry Creek – West Placer on Draft EIS page 2.0-35 is revised as follows:

The County approved the CP in 1990, modified it as part of the approval of an updated General Plan in 1994, and ~~the plan was~~ subsequently revised it again in 2007 as part of the Placer Vineyards project approvals.

Table 2.0-4 on Draft EIS page 2.0-36 is revised as follows:

Table 2.0-4
Proposed Action and Alternatives – Acreages by Land Use and Potential Waters of the U.S. Impacts

Alternative	Development Footprint	Residential Acreage	Residential Units at Buildout	Other Development Acreage		Open Space Acreage	Potential Impacts on Aquatic Resources[1]
Proposed Action	361	245	2,029	Commercial	43	36	9.61 (2.98 acres preserved)
				Public/Quasi-Public	11		
				Parks	16		
				Roads[2]	46		
No Action	275	177	~~1,412~~1.505	Commercial	30	122	0 (12.55 acres preserved)
				Public/Quasi-Public	12		
				Parks	14		
				Roads[2]	44		
Reduced Footprint/ Increased Density	267	153	1,890	Commercial	40	130	3.10 (9.47 acres preserved)
				Public/Quasi-Public	12		
				Parks	16		
				Roads[2]	47		
Reduced Footprint/ Same Density	267	158	1,405	Commercial	40	130	3.10 (9.47 acres preserved)
				Public/Quasi-Public	12		
				Parks	11		
				Roads[2]	47		
Central Preserve	271	162	1,415	Commercial	40	126	~~5.05~~5.0 3 (~~7.52~~7.51 acres preserved)
				Public/Quasi-Public	11		
				Parks	12		
				Roads[2]	46		
One Acre Fill	236	140	1,340	Commercial	23	161	~~0.94~~0.92 (11.63 acres preserved)
				Public/Quasi-Public	12		
				Parks	13		
				Roads[2]	49		
Half Acre Fill	223	129	1,256	Commercial	19	174	0.47 (12.08 acres preserved)
				Public/Quasi-Public	13		
				Parks	13		

				Roads[2]	50		
Off-Site	346	179	1,560	Commercial/ Industrial	80	~~60~~61	11.92[3] (3.9 acres preserved)
				Public/Quasi-Public	12		
				Parks	14		
				Roads[2]	~~43~~61		

[1] *Preliminary estimate based on land use plans and existing information on wetlands and other jurisdictional waters on the project site. Acres of aquatic resources preserved under the alternative are reported in parentheses.*

[2] *Includes the area of major roads and landscape corridors.*

[3] *This alternative would also fill an additional ~~0.3~~0.02 acre of the waters of the U.S. off-site in association with the construction of the off-site infrastructure improvements ~~for a total impact of about 6.5 acres~~.*

3.0 Environmental Setting

The third bullet in the middle of Draft EIS page 3.0-10 is revised as follows:

- The Regional University ~~and Community~~ Specific Plan project is an approximately 1,100-acre (445-hectare) site, located approximately 1.5 mile (2.4 kilometers) north of Baseline Road. It includes a 600-acre (242-hectare) area designated for a private university campus, and other areas designated for residential and commercial uses.

3.1 Aesthetics

The third sentence of the first paragraph on Draft EIS page 3.1-2 is revised as follows:

Land to the west is located in the Regional University ~~and Community~~ Specific Plan area and the Curry Creek Community Plan area which is located in unincorporated Placer County. The land to the west is presently under rice production.

3.2 Agricultural Resources

The first sentence of the first paragraph under *Western Boundary of Project Site* on Draft EIS page 3.2-14 is revised as follows:

Lands to the northwest of the project site above Pleasant Grove Boulevard are planned for development under the Regional University ~~and Community~~ Specific Plan.

3.3 Air Quality

Table 3.3-2 on Draft EIS page 3.3-6 is revised as follows:

Table 3.3-2
Placer County Attainment Status (Western Portion of County)

Pollutant	Federal Standards	State Standards
Ozone 1-hour	No federal standard	Nonattainment/Serious
Ozone 8-hour	Nonattainment/Severe-15[1]	Nonattainment
Nitrogen Dioxide	Attainment	Attainment
Carbon Monoxide	Unclassified/Attainment	Unclassified/Attainment
Sulfur Dioxide	Unclassified/Attainment	Attainment
PM10	~~Attainment~~Unclassified	Nonattainment
PM2.5	Nonattainment	Attainment
Lead	Unclassified	Attainment
Hydrogen Sulfide	No federal standards	Unclassified
Sulfates	No federal standards	Attainment
Visibility-Reducing Particulates	No federal standards	Unclassified

Sources:
California Air Resources Board, "Area Designations Maps/State and National," http://www.arb.ca.gov/desig/adm/adm.htm. 2012.
U.S. Environmental Protection Agency, "Air Quality Maps," http://www.epa.gov/region9/air/maps/index.html. 2012
[1] *A formal request for voluntary reclassification from "serious" to "severe" for the 8-hour ozone nonattainment area with an associated attainment deadline of June 15, 2019, was submitted by CARB to the USEPA on February 14, 2008. The USEPA approved the reclassification request on April 15, 2010.*

The first paragraph of Cumulative Impact AQ-1 on Draft EIS page 3.3-36 is revised as follows:

The No Action Alternative, Proposed Action, and all ~~A~~alternatives ~~1 through 6~~ would have a less than significant cumulative impact from ~~construction emissions and~~ CO concentrations but would have a significant cumulative impact due to construction emissions and operational emissions.

Table 3.3-9 on Draft EIS page 3.3-38 is revised as follows:

Table 3.3-10
Other Major DA Permit Projects in the Air Basin –
Construction Emissions (Pounds per Day)

Project	ROG	NO_x	PM10	PM2.5
Folsom South[a]	**120**	**128**	579	126
Natomas Levee, Phase 2[b]	NA	NA	NA	NA
Natomas Levee, Phase 3b[c]	NA	NA	NA	NA
Natomas Levee, Phase 4A[d]	**303**	**1,846**	15,388	NA

Rio Del Oro[e]	**627**	**2,071**	NA	NA
Sunridge Properties[f]	**385**	**501**	276	NA
Arboretum	NA	NA	NA	NA
Cordova Hills[g]	**3,616**	**405**	2,723	576
River Islands at Lathrop	NA	NA	NA	NA
Suncreek[h]	**194**	**141**	289	64
Mather Specific Plan [i]	739	**100**	144	32
Folsom Dam Modification Project Approach Channel[j]	10	46	126	18
Southport Sacramento River Early Implementation Project [k]	34	**342**	**12,948**	14.7
Folsom South of U.S. 50 Specific Plan Project [l]	10.6	**89.8**	**388.0**	199.1

Note:
NA – not available
Emissions reported are maximum emissions generated in any year of construction.
The significance thresholds differ depending on the Air Quality Management District.
Bold: *Exceeds Significance Thresholds. Significance Thresholds are not the same for all of the projects listed.*
a. Department of the Army Permit SPK-2007-02159. August 11, 2011.
b. Department of the Army Permit SPK-2007-00211. January 21, 2009.
c. Department of the Army Permit SPK-2008-01039. April 2, 2010.
d Department of the Army Permit SPK-2009-00480. November 8, 2010.
e. Department of the Army Permit SPK-1999-00590. June 13, 2012.
f. Department of the Army Permit SPK-2009-00511. January 25, 2011.
g Cordova Hills: Sacramento County, Cordova Hills Final EIR, Document Control Number 2008-00142
h Suncreek Specific Plan Project Draft EIR. Prepared for the City of Rancho Cordova by AECOM, October 2012.
i Department of the Army Permit SPK-2002-561. June 2012
j Folsom Dam Modification Project, Approach Channel. Supplemental EIS/EIR, December 2012.
k Southport Sacramento River Early Implementation Project EIS/EIR. November 2013.
l Folsom South of U.S. 50 Specific Plan Project EIS/EIR. June 2010.

Table 3.3-15 on Draft EIS page 3.3-43 is revised as follows:

Table 3.3-15
Other Major DA Permit Projects in the Air Basin –
Operational Emissions (Pounds per Day)

Project	ROG	NOx	PM10	PM2.5
Folsom South[a]	**2,061**	**709**	2,433	1,529
Natomas Levee, Phase 2[b]	NA	NA	NA	NA
Natomas Levee, Phase 3b[c]	NA	NA	NA	NA
Natomas Levee, Phase 4A[d]	NA	NA	NA	NA
Rio Del Oro[e]	**733**	**676**	1,115	NA
Sunridge Properties[f]	**NA**	**NA**	**NA**	NA
Arboretum	NA	NA	NA	NA
Cordova Hills[g]	**857**	**415**	1,326	252

River Islands at Lathrop	NA	NA	NA	NA
Suncreek[h]	**523**	**335**	961	185
Mather Specific Plan[i]	**937**	**620**	2,396	724
Folsom Dam Modification Project Approach Channel[j]	0	0	0	0
Southport Sacramento River Early Implementation Project[k]	NA	NA	NA	NA
Folsom South of U.S. 50 Specific Plan Project[l]	1,393	521	1,741	997

Note:
NA – not available
Emissions reported are maximum unmitigated emissions generated.
The significance thresholds differ depending on the Air Quality Management District.
Bold: *Exceeds Significance Thresholds. Significance Thresholds are not the same for all of the projects listed.*

a. Department of the Army Permit SPK-2007-02159. August 11, 2011.
b. Department of the Army Permit SPK-2007-00211. January 21, 2009.
c. Department of the Army Permit SPK-2008-01039. April 2, 2010.
d Department of the Army Permit SPK-2009-00480. November 8, 2010.
e. Department of the Army Permit SPK-1999-00590. June 13, 2012.
f. Department of the Army Permit SPK-2009-00511. January 25, 2011.
g Cordova Hills: Sacramento County, Cordova Hills Final EIR, Document Control Number 2008-00142
h Suncreek Specific Plan Project Draft EIR. Prepared for the City of Rancho Cordova by AECOM, October 2012.
i Department of the Army Permit SPK-2002-561. June 2012
j Folsom Dam Modification Project, Approach Channel. Supplemental EIS/EIR, December 2012.
k Southport Sacramento River Early Implementation Project EIS/EIR. November 2013.
l Folsom South of U.S. 50 Specific Plan Project EIS/EIR. June 2010.

Additional analysis is added below the first paragraph on Draft EIS page 3.3-45 as follows:

As shown above, even though total population and vehicle traffic are projected to increase by 25 percent and 17 percent respectively, daily emissions of ozone precursors are expected to decrease substantially, with NOx emissions decreasing by 55 percent and ROG by 35 percent between 2018 and 2035 as a result of vehicle fleet improvements, fuel efficiency measures, transportation control measures in the SIP for the SACOG region, and denser future development pursuant to the SCS. These population and traffic increases represent the best estimates of overall growth projections for the region and include projects such as Westbrook as well as other projects in the region.[2]

Higher density development, such as the Reduced Footprint/Increased Density Alternative, has the potential to reduce sprawl. In general, greater development density typically results in reduced vehicle miles traveled (VMT) as residents have a shorter distance to travel to services. In addition, higher density would encourage use of alternative transportation such as buses, bicycles, and walking, which would further reduce the number of vehicle trips. Therefore, criteria air emissions would be reduced. Lower density development (such as the Proposed Action and all the other alternatives except the Reduced Footprint/Increased Density), would comparatively increase the number and length of vehicle trips which would result in greater criteria air emissions than higher density developments.

3.4 Biological Resources

The last sentence on Draft EIS page 3.4-16 is revised as follows:

As the table above shows, within the watersheds where listed invertebrates were detected, there are a total of 2.38 acres (0.96 hectare) of vernal pools, 1.17 acres (0.47 hectare) of seasonal wetlands, 6.15 acres (2.49 hectares) of wetland swales, and 1.18 acres (0.48 hectare) of swale depressional habitat; this amounts to ~~10.88~~9.70 acres (~~4.40~~ 3.93 hectares) of aquatic habitat in these watersheds.

The second sentence on Draft EIS page 3.4-18 is revised as follows:

If the acres of aquatic habitat in watersheds where listed invertebrates were not detected are added in, the project impact area contains about ~~12.96~~11.78 acres (~~5.24~~4.77 hectares) of potential aquatic habitat for listed invertebrates.

The Proposed Action analysis under Impact BIO-1 and Tables 3.4-9a and 3.4-9b on Draft EIS page 3.4-44 are revised as follows:

Proposed Action	*Direct Effects from Placement of Fill* As shown in **Table 3.4-9a, Proposed Action Impacts to Waters of the U.S.,**

[2] Please see DRAFT MTP/SCS 2035 Update Appendix E-3 for projected changes in land use, population, and employment in the SACOG region through 2035.

implementation of the Proposed Action would result in the filling of 9.61 acres (3.89 hectares) of wetlands and "other waters" of the U.S., resulting in the loss of aquatic resource area and functions. This total ~~includes 9.56 acres (3.87 hectares) of on-site impacts and 0.05 acre (0.02 hectare) of off-site impacts and~~ comprises placement of fill in 0.62<u>4</u> acre (0.25 hectare) of seasonal wetlands, 0.87<u>3</u> acre (0.35 hectare) of vernal pools, and ~~7.00~~8.104 acres (~~2.83~~3.28 hectares) of wetland swales. **Figure 3.4-5** shows the affected aquatic resources on the project site ~~and in the off-site impact area~~.

Within the project site boundaries, 2.98<u>3</u> acres (1.21 hectares) of on-site vernal pools and other aquatic resources would be preserved <u>and managed</u> and ~~9.56~~<u>9.61</u> acres (~~3.87~~<u>3.89</u> hectares) ~~of the 12.55 acres (5.08 hectares)~~ of waters of the U.S. would be filled. Loss of aquatic resources would occur as a result of grading in preparation for development, construction of roads and utility corridors, and other ground-disturbing activities related to construction. Given that the on-site vernal pools and seasonal wetlands that would be filled are highly disturbed from disking, grazing, and cultivation and the Proposed Action would fill a small acreage of the waters of the U.S., the effect is considered **less than significant.**

To address the filling of the waters of the U.S., the Applicant has put forth a mitigation plan to compensate for the loss of wetlands and other waters of the U.S. that will consist of preservation ~~and creation~~ of aquatic resources on the project site and purchase of constructed vernal pools and other wetlands creation/restoration and preservation credits from ~~an~~ approved conservation bank<u>s</u> in western Placer County. The key elements of the ~~conceptual~~ mitigation plan are described below ~~(See **Appendix 3.4** for the Applicant's conceptual compensatory mitigation plan)~~. **Table 3.4-9b, Proposed Action Impacts and Mitigation Area Summary**, presents acres of wetlands that would be affected under the Proposed Action and acres of wetlands that would be created or preserved under the Applicant's ~~conceptual~~ <u>revised</u> compensatory mitigation plan.

On-Site Preservation

The conceptual compensatory mitigation plan proposes preservation of 2.98 acres (1.21 hectares) of wetlands and other waters of the U.S. on the project site in perpetuity and managed to maintain their resource functions and values. These would be preserved within the designated open space on the project site.

~~**On-Site Wetlands Creation**~~

~~The proposed on-site wetlands creation plan for the Proposed Action is shown in **Figure 3.4-6, Proposed On-Site Wetlands Creation**. The proposed on-site wetland creation has been designed to partially compensate for impacts to seasonal wetlands and swale wetlands.~~

~~According to the conceptual compensatory mitigation plan, a total of 3.88 acres~~

~~(1.57 hectares) of seasonal wetlands would be constructed on the project site. The wetlands to be created would be located on low terraces excavated adjacent to two existing intermittent stream channels in the northwestern portion of the project site. The wetlands to be constructed would be located along the inside of existing stream meanders and along relatively straight reaches so as to avoid being intercepted by the natural meandering of the creek channel.~~

Off-Site Creation/Restoration

According to the ~~conceptual~~ revised compensatory mitigation plan, the Applicant proposes to provide 0.873 acre of vernal pool restoration credits and up to 16.831 acres of riparian and freshwater marsh complex and/or seasonal wetland creation credits from an approved mitigation bank. ~~secure 2.40 acre (0.97 hectare) of constructed vernal pool creation/restoration credits and 7.00 acres (2.83 hectares) of constructed seasonal wetland creation credits from an approved mitigation bank in western Placer County within the bank's approved service area.~~

Off-Site Preservation

According to the ~~proposed conceptual~~ revised compensatory mitigation plan, the Applicant proposes to secure ~~5.94~~22.62 acres (~~2.40~~ 9.15 hectares) of vernal pool preservation credits from an approved conservation bank in western Placer County within the bank's approved service area.

The Applicant also wishes to maintain the option to develop a permittee-sponsored off-site mitigation plan in lieu of the purchase of credits.

~~The mitigation plan put forth by the Applicant is conceptual and subject to change.~~ As the USACE does not have a final mitigation plan and does not know specifically what would be constructed, there is uncertainty as to whether constructed wetlands will be functioning before the project site wetlands are filled, and because not all compensatory mitigation would be within the watershed of the impacts, **Mitigation Measure BIO-1a** will be imposed which would ensure that this **direct** effect on the waters of the U.S. would remain **less than significant**.

Indirect Effects

The northwestern corner of the project site has been designated as open space in the land use plan for the Westbrook project and the Applicant proposes to establish a 35.8-acre (14.49-hectare) open space preserve in this area. This open space preserve encompasses the two intermittent streams that cross the project site and includes moderate concentrations of both vernal pools and seasonal wetlands located in proximity of the drainages. As a result of designating this open space preserve on the project site, 2.98 acres (1.21 hectares) of aquatic resources, which include 0.95 acre (0.38 hectare) of vernal pools, 0.36 acre (0.15 hectare) of wetland swale, ~~0.72~~0.73 acre (0.30 hectare) of seasonal wetlands, and 0.95 acre of stream habitat would be preserved within the project site as part of the Proposed Action (Gibson & Skordal 2012b and

2013).

~~Indirect impacts to the preserved aquatic resources within the open space preserve are generally not anticipated in the short term because grading or other ground disturbance in the vicinity of the preserved aquatic resources would be limited to the excavation of the floodplain expansion area and excavation related to new aquatic resources that would be created within the open space area. Nonetheless, there could be inadvertent impacts during grading that occurs near the preserved aquatic resources and **Mitigation Measure BIO-1b** is proposed to avoid such impacts.~~

Due to their location and measures included in the Proposed Action, indirect effects to preserved aquatic resources are not anticipated ~~in the long term~~. The preserved aquatic resources would be located in the northwestern portion of the project site within the open space preserve which is flanked to the east, north, and west by existing preserved open space, and therefore would be distant from any on-site or off-site development. The preserved aquatic resources would be located within the portion of the open space preserve that is designated primary open space area, where no grading ~~other than to create new wetlands~~ would occur. This area would be put under conservation easements prior to commencement of construction on the Proposed Action. The portion of the open space preserve that would adjoin the land on the project site that would be developed would be subject to development-related grading and filling. However, once these grading and filling activities are completed, this area would also be placed under conservation easements. The entire open space preserve, including the preserved and created wetlands, would be managed for conservation consistent with the City of Roseville's Open Space Preserve Overarching Management Plan (O&M Plan) that has been approved by the resource agencies. Open space preservation under the Proposed Action is intended to complement regional conservation strategies such as the proposed Placer County Conservation Plan, and coordination with other agencies and conservation efforts would be a guiding principle of the Westbrook's resource management approach. The resource management approach would also be designed for consistency with the Memorandum of Understanding (MOU) between the City and USFWS with respect to the operation and expansion of the Pleasant Grove Wastewater Treatment Plant (PGWWTP), and, if the USACE issues a DA permit, with the terms and conditions of the permit. Depending on permit terms and conditions, the Applicant expects to conduct the following types of activities in open space areas consistent with the City of Roseville's O&M Plan: maintenance of a 30-foot (9-meter) fire control strip (on the southern portion of the open space only within the secondary open space), maintenance of the trail in the same area, and minimal maintenance of the rest of the preserve. For all of these reasons, indirect effects on preserved aquatic resources would be **less than significant**. To further reduce the potential for **indirect** effects ~~in the long term~~, **Mitigation Measure BIO-1b** will be imposed.

Table 3.4-9a
Proposed Action Impacts to Waters of the U.S. (in Acres)

Wetland Type	Waters of the U.S. ~~on Project Site~~within the Project Site	~~Waters of the U.S. within 250 feet of Project Site Boundary~~	~~On-Site~~ Direct Impacts	~~Off-Site Impacts~~	Waters of the U.S. Preserved on Project Site
Intermittent Stream	0.95	~~0.15~~	0.00	~~0.00~~	0.95
~~Pond~~	~~0.00~~	~~0.56~~	~~0.00~~	~~0.00~~	~~0.00~~
Seasonal Wetland	1.35	~~0.03~~	0.62	~~0.00~~	~~0.72~~0.73
Vernal Pool	1.81	~~0.79~~	~~0.86~~0.87	~~0.01~~	0.95
Wetland Swale	~~7.31~~8.44	~~0.48~~	~~6.97~~8.11	~~0.03~~	0.36
~~Swale Depressional~~	~~1.12~~	~~0.06~~	~~1.12~~	~~0.01~~	~~0.00~~
Total	**12.55**	**~~2.07~~**	**~~9.569~~.61**	**0.05**	**2.98**

Source: Gibson & Skordal ~~2012a and 2012c~~ 2013b
Note: Numbers may not sum to total due to rounding.

Table 3.4-9b
Proposed Action Impacts and Mitigation ~~Area~~ Summary (in Acres)

Wetland Type	~~On-Site~~ Direct Impacts	~~Off-Site Impacts~~	On-Site Preservation	~~On-Site Creation~~	Off-Site Preservation	Off-Site Restoration/ Creation
Intermittent Stream	0.00	~~0.00~~	0.95	~~0.00~~	0.00	0.00
Seasonal Wetland	0.62	~~0.00~~	~~0.72~~0.73	~~3.88~~	0.00	~~7.00~~16.83
Vernal Pool	~~0.86~~0.87	~~0.01~~	0.95	~~0.00~~	~~5.94~~22.62	~~2.40~~0.87
Wetland Swale	8.~~08~~11	~~0.04~~	0.36	~~0.00~~	0.00	0.00
Total	**~~9.569~~.61**	**~~0.05~~**	**2.98**	**~~3.88~~**	**~~5.94~~22.62**	**~~9.40~~17.7**

Source: Gibson & Skordal ~~2012a and 2012c~~ 2014
Note: Numbers may not sum to total due to rounding.

Figure 3.4-6, Proposed On-Site Wetlands Creation, has been removed and the subsequent figures in Section 3.4 have not been renumbered.

Mitigation Measure BIO-1a on Draft EIS page 3.4-61 is revised as follows:

Mitigation Measure BIO-1a: **Restoration and/or Establishment of Wetlands and Other Waters of the U.S.**
(Applicability – Proposed Action and All Alternatives except No Action)

Prior to the approval of the Record of Decision for the Proposed Action, in order to mitigate for the unavoidable loss of wetlands and other waters of the U.S., the Applicant shall develop a compensatory mitigation and monitoring plan that will consist of ~~restoration or and establishment of aquatic resources on the project site and~~ purchase of vernal pool and seasonal wetlands creation/restoration credits, and/or provide permittee-responsible restoration at an off-site location. This plan shall be implemented prior to or concurrent with the occurrence of impacts. The mitigation and monitoring plan shall include plans for the restoration or establishment of aquatic habitat to adequately offset and replace the aquatic functions and services that would be lost within the project area, and contain an adequate margin of safety to reflect anticipated success, as well as identify any off-site locations proposed for compensatory mitigation and/or identify the mitigation bank proposed to be used and the credits of each habitat type proposed to be purchased. Any mitigation bank proposed to be used ~~shall be located within Placer County and~~ shall include the project site within its service area. In addition, in order to reduce cumulative impacts within the area, the Applicant shall attempt to identify and utilize a mitigation bank located within the same watershed as the proposed impacts. The submitted mitigation and monitoring plan shall include the mitigation location and design drawings, vegetation plans, including target species to be planted, and final success criteria, and shall ~~be presented in the format~~meet the standards of current guidance and regulations (e.g., USACE Sacramento District's "Habitat Mitigation and Monitoring Proposal Guidelines," dated December 30, 2004, USACE regulations at 33 CFR 332, etc.). The compensatory mitigation plan shall ensure no net loss of wetland functions and services of all aquatic resources that would be removed, lost, and/or degraded as a result of implementing the proposed project or any alternative.

Within the Record of Decision for the Proposed Action, the USACE shall document its determination regarding the appropriate amount and type of restoration or establishment required to ensure no net loss of aquatic resource functions and services, based on a number of factors, including the functions of the resources being impacted, the difficulty of replacing the specific resource, uncertainty and risk of failure, indirect impacts and temporal loss. Any approval of a final mitigation and monitoring plan by the USACE shall include requirements for site protection, the implementation of appropriate financial assurances and monitoring of the creation and/or restoration areas in accordance with applicable regulations and guidance.

The last paragraph of Mitigation Measure BIO-1b on Draft EIS page 3.4-61 is revised as follows:

Within the Record of Decision for the Proposed Action, the USACE shall document its determination on whether any required on-site preservation or any proposed off-site preservation is an appropriate method of compensatory mitigation to offset unavoidable impacts to aquatic resources on the project site. If the USACE determines that preservation of on-site or off-site aquatic resources is appropriate to utilize as compensatory mitigation, the USACE will determine the amount and type of preservation required to ensure no net loss of aquatic resource functions and services, based on a number of factors, including the functions of the resources being impacted, the difficulty of

replacing the specific resource, uncertainty and risk of failure, indirect impacts and temporal loss. Any approval of a long-term management plan by the USACE shall include requirements for site protection, the implementation of appropriate financial assurances and monitoring of the preserve areas in accordance with applicable regulations and guidance. The use of an approved mitigation bank that includes the project site within its service area would satisfy the mitigation requirements.

The Proposed Action and Alternatives 1 through 5 analyses under Impact BIO-2 and Tables 3.4-15 through 3.4-19 starting on Draft EIS page 3.4-63 are revised as follows:

Proposed Action

The Proposed Action would directly and indirectly affect listed vernal pool invertebrates and their habitat. As noted earlier, the project site is located in the Placer County core area (Zone 2) identified by the USFWS for the recovery of vernal pool invertebrate species. Vernal pool fairy shrimp have been observed within two watersheds entirely on the project site and two watersheds that are partially on the project site. Suitable habitat for listed vernal pool invertebrates such as vernal pool fairy shrimp and vernal pool tadpole shrimp is present on the project site. Vernal pool invertebrate aquatic habitat is recognized here as all wetlands with vernal pool hydrology. Because the line between vernal pools and seasonal wetlands is often obscure, it is reasonable to apply a geomorphic standard rather than a vegetation standard to determine whether or not a particular feature could support a breeding population of listed vernal pool invertebrates. Vernal pool hydrology means those wetlands that fill with winter rains and dry by mid spring and do not receive any dry season supplemental water. On the project site, this includes intermittent streams, vernal pools, seasonal wetlands, and ~~depressional areas within~~ wetland swales.

The Proposed Action would directly affect listed vernal pool invertebrates and their aquatic habitat by grading and placing fill in vernal pools, seasonal wetlands, and swale depressional areas. Grading activities would result in species mortality and permanent loss of vernal pool habitat. In addition, as noted earlier, should construction activities occur within 250 feet of vernal pools and wetlands, even though those pools and wetlands would not be filled, the habitat value of the pools could decline. **Table 3.4-15, Proposed Action Impacts to Listed Vernal Pool Invertebrate Habitat,** presents the total amount of vernal pool invertebrate aquatic habitat present on the project site and the off-site impact area, acres of habitat directly and indirectly impacted by the Proposed Action on the project site as well as off-site. As the table shows, of the total invertebrate aquatic habitat on the project site and the off-site impact area which is defined to include intermittent streams, vernal pools, seasonal wetlands, and ~~swale depressional areas only~~wetland swales, the Proposed Action would directly remove by filling about ~~2.31 acres (0.94 hectare) within watersheds where listed vernal pool invertebrates were detected and about 0.31 acre (0.13 hectare) in watersheds where listed vernal pool invertebrates were not detected~~9.61 acres (3.89 hectares) of vernal pool invertebrate habitat. In addition, development in the northwestern portion and the southern portion of the project site

would be less than 250 feet (76 meters) of wetlands and vernal pools that are either off-site or within the designated open space area on the project site. Although the Proposed Action would not directly fill these aquatic habitats, the Proposed Action would have the potential to indirectly affect them because urban development would be less than 250 feet (76 meters) of these features. An estimated 0.~~68~~94 acre (0.~~28~~38 hectare) of vernal pool invertebrate habitat would be affected indirectly in this manner.

~~If invertebrate aquatic habitat is defined to include vernal pools, seasonal wetlands and wetland swales, then based on the numbers in **Table 3.4-15**, the Proposed Action would directly affect about 8.5 acres of this habitat and indirectly affect another 0.61 acre.~~

The impact acreages reported above include about 0.02 acre of direct impacts and about 0.19 acre of indirect impacts which are anticipated to occur off-site on resources present along the project site's southern boundary. The two properties to the south of the project site are part of the Sierra Vista Specific Plan. In the event that that project receives DA permits from the USACE and the two properties to the south begin construction before the Westbrook project is authorized and begins construction, these off-site direct and indirect impacts would not occur in association with the Westbrook project.

Table 3.4-15
Proposed Action Impacts to Listed Vernal Pool Invertebrate Habitat (in Acres)

Type	Total Potential Habitat in Action Area	~~Project Site~~			~~Off-Site~~		Direct Impacts in Action Area	Indirect Impacts Within 250 Feet of Development
		~~Occurrence Detected Watersheds - Direct Impacts~~	~~Occurrence Not Detected Watersheds - Direct Impacts~~	~~Occurrence Detected Watersheds - Indirect Impacts~~	~~Occurrence Detected Watersheds - Direct Impacts [1]~~	~~Occurrence Detected Watersheds - Indirect Impacts [2]~~		
Intermittent Stream	1.10	-	-	-	-	-	0.00	0.32
Vernal Pools	2.60	~~0.78~~	~~0.10~~	~~0.35~~	~~0.01~~	~~0.11~~	0.87	0.35
Seasonal Wetlands	1.38	~~0.41~~	~~0.21~~	~~0.12~~	~~0.00~~	~~0.03~~	0.62	0.12
Wetland Swales	~~7.80~~8.98	~~5.53~~	~~1.44~~	~~0.00~~	~~0.03~~	~~0.00~~	8.11	0.14
~~Swale Depressional~~	~~1.18~~	~~1.11~~	~~0.00~~	~~0.02~~	~~0.01~~	~~0.05~~	-	-
~~**Total[3]**~~	~~**5.16**~~	~~**2.30**~~	~~**0.31**~~	~~**0.49**~~	~~**0.02**~~	~~**0.19**~~	-	-
Total[4]	~~**11.78**~~ **14.05**	~~**6.72**~~	~~**1.75**~~	~~**0.47**~~	~~**0.04**~~	~~**0.14**~~	**9.61**	**0.94**

Source: Gibson & Skordal ~~2012a~~2013a; Impact Sciences 2012
Note: Action Area is defined as the project site and the 250-foot band around the project site.
Numbers may not sum to total due to rounding.
~~*Note: Swale depressional areas are depressions within wetland swales. Wetland swale acreage includes swale depressional acreage.*~~
~~*[1] Off-Site direct impacts are assumed to occur to invertebrate habitat within a 30-foot band of the project site.*~~
~~*[2] Off-Site indirect impacts are assumed to occur to invertebrate habitat between 30 feet and 250 feet of the project site.*~~
~~*[3] Total includes vernal pools, seasonal wetlands, and swale depressional habitat.*~~
~~*[4] Total includes vernal pools, seasonal wetlands, and wetland swale habitat.*~~

Based on the above, the USACE has determined that the loss of listed vernal pool invertebrates or their habitat as a result of grading, filling, or indirect degradation would be a **significant direct** and **indirect** effect.

As discussed under **Impact BIO-1** above, **Mitigation Measure BIO-1a** would be implemented to mitigate the impacts of the Proposed Action on waters of the U.S., including vernal pools. This mitigation would also compensate for the loss of invertebrate habitat and mitigate the Proposed Action's **direct** effects on listed vernal pool invertebrates. In addition, **Mitigation Measures BIO-1b** and **2b** would be implemented to mitigate the Proposed Action's **indirect** effects on listed vernal pool invertebrates.

As stated earlier, the Westbrook project designates the northwestern corner of the project site as open space/wetlands preserve, and vernal pool invertebrate habitat present within this open space area would not be directly affected. A pedestrian trail under the Proposed Action would be located along the southern edge of the open space area and would include educational signage at open space boundaries. This would minimize the potential for indirect effects from passive recreational use and human access. However, ground-disturbing activities associated with development of the area to the south of the open space area~~, as well as ground disturbing activities associated with the construction of created wetlands within the open space area~~ would have the potential to impact the avoided vernal pool invertebrate habitat. In addition changes to hydrological conditions or erosion of adjacent uplands that could result in the deposition of sediment within the avoided wetlands, discharge of urban runoff containing fertilizers, pesticides and herbicides, and an increase in exotic weed species are some of the other potential indirect effects that could occur on the avoided habitat on-site as well vernal pool invertebrate habitat off-site along the project site boundary. Maintenance activities such as firebreak maintenance, weed abatement, and maintenance of the trail, could also degrade habitat. **Mitigation Measure BIO-1b** would avoid and reduce indirect impacts on preserved vernal pools and wetlands from construction. In summary, with mitigation, this would be a **less than significant indirect** effect.

Alts. 1&2 (Reduced Footprint Increased Density/Same Density)

Alternatives 1 and 2 would have the same development footprint and are therefore evaluated together. As shown in **Table 3.4-16,** if suitable habitat is defined to include intermittent streams, vernal pools, seasonal wetlands, and ~~swale depressional areas only~~wetland swales, the alternatives would directly affect about ~~1.06 acres (0.43 hectare) within watersheds where listed vernal pool invertebrates were detected and about 0.46 acre (0.19 hectare) in watersheds where listed vernal pool invertebrates were not detected for a total direct effect on 1.52 acres (0.62 hectare)~~ 2.95 acres (1.19 hectares) of vernal pool invertebrate habitat. As with the Proposed Action, some of the development under Alternatives 1 and 2 would be within 250 feet (76 meters) of invertebrate aquatic

habitat that would not be filled by the alternative but could be indirectly degraded. An estimated 1.~~35~~53 acres (0.~~55~~62 hectare) of habitat would be affected in this manner.

~~If suitable aquatic habitat for invertebrates is defined to include vernal pools, seasonal wetlands and wetland swales, then based on the numbers in **Table 3.4-16**, Alternatives 1 and 2 would directly affect about 2.95 acres and indirectly affect another 1.31 acres of this habitat.~~

The loss of listed vernal pool invertebrates or their habitat as a result of grading, filling, or indirect degradation under Alternatives 1 and 2 would be a **significant direct** and **indirect** effect.

Mitigation Measure BIO-1a would reduce direct effects on listed vernal pool invertebrate habitat by providing replacement habitat and preserving wetlands similar to those removed by the alternative. **Mitigation Measures BIO-1b** and **BIO-2b** would also be implemented to avoid or reduce both direct and indirect impacts on vernal pool species habitat within the preserved areas on the project site. With mitigation, the **direct** and **indirect** effects would be **less than significant**.

Table 3.4-16
Alternatives 1 and 2 Impacts to Listed Vernal Pool Invertebrate Habitat (in Acres)

Type	Total Potential Habitat in Action Area	~~Project Site~~			~~Off-Site~~		Direct Impacts in Action Area	Indirect Impacts Within 250 Feet of Development
		~~Occurrence Detected Watersheds – Direct Impacts~~	~~Occurrence Not Detected Watersheds – Direct Impacts~~	~~Occurrence Detected Watersheds – Indirect Impacts~~	~~Occurrence Detected Watersheds – Direct Impacts [1]~~	~~Occurrence Detected Watersheds – Indirect Impacts [2]~~		
Intermittent Stream	1.10	~~–~~	~~–~~	~~–~~	-	-	0.00	~0.21
Vernal Pools	2.60	~~0.27~~	~~0.10~~	~~N/A~~	~~0.01~~	~~0.07~~	0.38	0.07
Seasonal Wetlands	1.38	~~0.58~~	~~0.19~~	~~N/A~~	~~0.00~~	~~0.03~~	0.77	0.03
Wetland Swales	~~7.80~~8.98	~~0.96~~	~~0.84~~	~~N/A~~	~~0.00~~	~~0.00~~	1.8	0.00
~~Swale Depressional~~	~~1.18~~	~~0.19~~	~~0.17[3]~~	~~N/A~~	~~0.01~~	~~0.04~~	-	-
~~**Total[4]**~~	~~**5.16**~~	~~**1.04**~~	~~**0.46**~~	~~**1.21[6]**~~	~~**0.02**~~	~~**0.14**~~	**-**	**-**
~~**Total[5]**~~ **14.05**	~~**11.78**~~	~~**1.81**~~	~~**1.13**~~	~~**1.21**~~	~~**0.01**~~	~~**0.10**~~	**2.95**	**~1.53[1]**

Source: Gibson & Skordal 2012a~~, and~~ 2012c and 2013a; Impact Sciences 2012
Note: Action Area is defined as the project site and the 250-foot band around the project site.
Numbers may not sum to total due to rounding.
~~*[1] Off-Site direct impacts are assumed to occur to invertebrate habitat within a 30-foot band of the project site.*~~
~~*[2] Off-Site indirect impacts are assumed to occur to invertebrate habitat between 30 feet and 250 feet of the project site.*~~
~~*[3] This number was estimated using the ratio of the acreage of swale depressional found within wetland swales in occurrence-detected watersheds for the Proposed Action.*~~
~~*[4] Total includes vernal pools, seasonal wetlands, and swale depressional habitat.*~~
~~*[5] Total includes vernal pools, seasonal wetlands, and wetland swale habitat.*~~
[6]1 ~~This acreage~~An additional 1.21 acres (0.49 hectares) is within 250 feet (76 meters) of project site development and therefore will be indirectly affected.

Alt. 3 (Central Preserve)	Alternative 3 would focus the area of development on the project site and leave large areas in the center of the site as open space, thus providing a contiguous swath of open space in the central and northwestern portion of the project site. As shown in **Table 3.4-17, Alternative 3 Impacts to Listed Vernal Pool Invertebrate Habitat,** if suitable habitat of invertebrates is defined to include intermittent streams, vernal pools, seasonal wetlands, and ~~swale depressional areas only~~wetland swales, the alternative would directly affect about ~~1.95 acres (0.79 hectare) of invertebrate aquatic habitat within watersheds where listed vernal pool invertebrates were detected and about 0.56 acre (0.23 hectare) in watersheds where listed vernal pool invertebrates were not detected for a total direct effect on 2.51 acres (1.02 hectares)~~ 5.01 acres (2.03 hectares) of vernal pool invertebrate habitat. In addition, ~~development under~~ this alternative would have the potential to indirectly affect about 0.~~31~~27 acre (0.1~~3~~1 hectare) of invertebrate aquatic habitat within 250 feet of development. ~~If suitable invertebrate aquatic habitat is defined to include vernal pools, seasonal wetlands and wetland swales, then based on the numbers in **Table 3.4-17**, Alternative 3 would directly affect about 5.26 acres and indirectly affect another 0.27 acre of this habitat.~~ The loss of listed vernal pool invertebrates or their habitat as a result of grading, filling, or indirect degradation would be a **significant direct** and **indirect** effect of the alternative. **Mitigation Measure BIO-1a** would reduce impacts on listed vernal pool invertebrate habitat by providing replacement habitat and preserving wetlands similar to those removed by the alternative. **Mitigation Measures BIO-1b** and **BIO-2b** would also be implemented to avoid or reduce both direct and indirect impacts on vernal pool species habitat within the preserved areas on the project site. The **direct** and **indirect** effect would be **less than significant** with mitigation.

Table 3.4-17
Alternative 3 Impacts to Listed Vernal Pool Invertebrate Habitat (in Acres)

Type	Total Potential Habitat in Action Area	~~Project Site~~			~~Off-Site~~		Direct Impacts in Action Area	Indirect Impacts Within 250 Feet of Development
		~~Occurrence Detected Watersheds – Direct Impacts~~	~~Occurrence Not Detected Watersheds – Direct Impacts~~	~~Occurrence Detected Watersheds – Indirect Impacts~~	~~Occurrence Detected Watersheds – Direct Impacts [1]~~	~~Occurrence Detected Watersheds – Indirect Impacts [2]~~		
Intermittent Stream	1.10	-	-	-	-	-	0.00	~0.00
Vernal Pools	2.60	~~1.15~~	~~0.10~~	~~N/A~~	~~0.01~~	~~0.07~~	0.58	0.07
Seasonal Wetlands	1.38	~~0.34~~	~~0.21~~	~~N/A~~	~~0.00~~	~~0.03~~	0.79	0.03
Wetland Swales	~~7.80~~8.98	~~2.20~~	~~1.25~~	~~N/A~~	~~0.00~~	~~0.00~~	3.64	0.00
~~Swale Depressional~~	~~1.18~~	~~0.44~~	~~0.25 [3]~~	~~N/A~~	~~0.01~~	~~0.04~~	-	-
~~**Total [4]**~~	~~**5.16**~~	~~**1.93**~~	~~**0.56**~~	~~**0.17 [6]**~~	~~**0.02**~~	~~**0.14**~~	-	-
Total [5]	~~**11.78**~~ **14.05**	~~**3.69**~~	~~**1.56**~~	~~**0.17**~~	~~**0.01**~~	~~**0.10**~~	**5.01**	**~0.27 [1]**

Source: Gibson & Skordal 2012a, ~~and~~ 2012c and 2013a; Impact Sciences 2012
Note: Action Area is defined as the project site and the 250-foot band around the project site.
Numbers may not sum to total due to rounding.
~~*[1] Off-Site direct impacts are assumed to occur to invertebrate habitat within a 30-foot band of the project site.*~~
~~*[2] Off-Site indirect impacts are assumed to occur to invertebrate habitat between 30 feet and 250 feet of the project site.*~~
~~*[3] This number was estimated using the ratio of the acreage of swale depressional found within wetland swales in occurrence-detected watersheds for the Proposed Action.*~~
~~*[4] Total includes vernal pools, seasonal wetlands, and swale depressional habitat.*~~
~~*[5] Total includes vernal pools, seasonal wetlands and wetland swales.*~~
[6][1] ~~This acreage~~An additional 0.17 acres (0.07 hectares) is within 250 feet (76 meters) of development and therefore will be indirectly affected.

Alt. 4 (One Acre Fill)	Alternative 4 would avoid filling of the vast majority of wetlands on the project site such that the alternative would involve only approximately 1 acre of fill. As a result, direct impacts to listed vernal pool invertebrate habitat would be substantially reduced. As shown in **Table 3.4-18, Alternative 4 Impacts to Listed Vernal Pool Invertebrate Habitat,** if suitable habitat for invertebrates is defined to include intermittent streams, vernal pools, seasonal wetlands, and ~~swale depressional areas only~~wetland swales, the alternative would directly affect about ~~0.48 acre (0.20 hectare) of invertebrate aquatic habitat within watersheds where listed vernal pool invertebrates were detected and about 0.04 acre (<0.02 hectare) in watersheds where listed vernal pool invertebrates were not detected for a total direct effect on 0.52 acre (0.21 hectare)~~0.93 acre (0.38 hectare) of vernal pool invertebrate habitat. The alternative would also have the potential to indirectly affect about 2.~~27~~31 acres (0.9~~2~~3 hectare) of invertebrate aquatic habitat within 250 feet of development. ~~If invertebrate aquatic habitat is defined to include vernal pools, seasonal wetlands and wetland swales, then based on the numbers in **Table 3.4-18**, Alternative 4 would directly affect about 0.92 acre and indirectly affect another 2.23 acres of this habitat.~~ Given the small number of acres of habitat affected directly or indirectly, the impact on listed vernal pool invertebrates or their habitat as a result of grading, filling, or indirect degradation would be a **less than significant direct** and **indirect** effect of the alternative. As discussed under **Impact BIO-1**, as the wetland fill under this alternative would be less than 1 acre (0.4 hectare), the USACE would consider authorization of this alternative under the LOP process. As noted earlier, a LOP will be issued only for those activities which meet specific criteria and which have only minor impacts on the aquatic environment. In addition, in accordance with 33 CFR 332 and the District's Mitigation and Monitoring Guidelines, applications for the LOP must include a compensatory mitigation plan that clearly demonstrates impacts to aquatic resources have been and will be avoided and minimized to the maximum extent practicable and there will be a net increase in functions of aquatic resources. In addition, any activity authorized by LOP must also meet the LOP general conditions. Mitigation provided pursuant to the LOP would further reduce the impact of Alternative 4 on vernal pool invertebrate aquatic habitat.

Table 3.4-18
Alternative 4 Impacts to Listed Vernal Pool Invertebrate Habitat (in Acres)

Type	Total Potential Habitat in Action Area	~~Project Site~~			~~Off-Site~~		Direct Impacts in Action Area	Indirect Impacts Within 250 Feet of Development
		~~Occurrence Detected Watersheds - Direct Impacts~~	~~Occurrence Not Detected Watersheds - Direct Impacts~~	~~Occurrence Detected Watersheds - Indirect Impacts~~	~~Occurrence Detected Watersheds - Direct Impacts [1]~~	~~Occurrence Detected Watersheds - Indirect Impacts [2]~~		
Intermittent Stream	1.10	-	-	-	-	-	0.00	~0.08
Vernal Pools	2.60	~~0.22~~	~~0.00~~	~~N/A~~	~~0.01~~	~~0.07~~	0.23	0.07
Seasonal Wetlands	1.38	~~0.18~~	~~0.00~~	~~N/A~~	~~0.00~~	~~0.03~~	0.18	0.03
Wetland Swales	~~7.80~~8.98	~~0.32~~	~~0.20~~	~~N/A~~	~~0.00~~	~~0.00~~	0.52	0.00
~~Swale Depressional~~	~~1.18~~	~~0.06~~	~~0.04[3]~~	~~N/A~~	~~0.01~~	~~0.04~~	-	-
~~**Total [4]**~~	~~**5.16**~~	~~**0.46**~~	~~**0.04**~~	~~**2.13[6]**~~	~~**0.02**~~	~~**0.14**~~	-	-
~~**Total [5]**~~	~~**11.78**~~	~~**0.72**~~	~~**0.20**~~	~~**2.13**~~	~~**0.01**~~	~~**0.10**~~	**0.93**	**~2.31[1]**

Source: Gibson & Skordal 2012a~~, and~~ 2012c and 2013a; Impact Sciences 2012
Note: Action Area is defined as the project site and the 250-foot band around the project site.
Numbers may not sum to total due to rounding.

~~*[1] Off-Site direct impacts are considered to be invertebrate habitat within a 30-foot band of the project site.*~~
~~*[2] Off-Site indirect impacts are considered to be invertebrate habitat between 30 feet and 250 feet of the project site.*~~
~~*[3] This number was estimated using the ratio of the acreage of swale depressional found within wetland swales in occurrence-detected watersheds for the Proposed Action.*~~
~~*[4] Total includes vernal pools, seasonal wetlands, and swale depressional habitat*~~
~~*[5] Total includes vernal pools, seasonal wetlands, and wetland swale habitat*~~
[6] ~~This acreage~~An additional 2.13 acres (0.86 hectares) is within 250 feet (76 meters) of development and therefore will be indirectly affected.

Alt. 5 (Half Acre Fill)	Alternative 5 would avoid filling of wetlands on the project site such that it would fill only about 0.5 acre (0.2 hectare) of jurisdictional wetlands. As a result, it would also substantially avoid the direct filling of invertebrate aquatic habitat on the project site and result in substantially reduced indirect effects on invertebrate habitat. As shown in **Table 3.4-19, Alternative 3 Impacts to Listed Vernal Pool Invertebrate Habitat,** if suitable habitat for invertebrates is defined to include intermittent streams, vernal pools, seasonal wetlands, and ~~swale depressional areas only~~wetland swales, the alternative would directly affect about ~~0.27 acre (0.11 hectare) and indirectly affect 2.35 acres (0.95 hectare) within watersheds where listed vernal pool invertebrates were detected on the project site~~0.47 acre (0.19 hectare) of vernal pool invertebrate habitat. ~~The alternative would not affect watersheds where listed vernal pool invertebrates were not detected on the project site. In addition, this alternative would not directly or indirectly affect off-site habitat.~~ The alternative would also have the potential to indirectly affect about 2.43 acres (0.98 hectare) of invertebrate aquatic habitat within 250 feet of development. ~~If invertebrate aquatic habitat is defined to include vernal pools, seasonal wetlands and wetland swales, then based on the numbers in **Table 3.4-19**, Alternative 5 would directly affect about 0.47 acre (0.19 hectare) and indirectly affect 2.35 acres (0.95 hectare) of this habitat.~~ Given the small number of acres of habitat affected directly or indirectly, the impact on listed vernal pool invertebrates or their habitat as a result of grading, filling, or indirect degradation associated with Alternative 5 would be a **less than significant direct** and **indirect** effect. As discussed under **Impact BIO-1**, as the wetland fill would be less than 0.5 acre (0.2 hectare), the USACE would consider authorization of this alternative under a nationwide permit. A nationwide permit would require that the fill impact be mitigated at a minimum ratio of 1:1 or at a ratio calculated through the use of the District's Mitigation Ratio Checklist. In addition, the alternative would also be required to comply with the general conditions in the nationwide permit. Mitigation provided pursuant to the nationwide permit would further reduce the impact of Alternative 5 on vernal pool invertebrate aquatic habitat.

Table 3.4-19
Alternative 5 Impacts to Listed Vernal Pool Invertebrate Habitat (in Acres)

Type	Total Potential Habitat	~~Project Site~~			~~Off-Site~~		Direct Impacts in Action Area	Indirect Impacts Within 250 Feet of Development
		~~Occurrence Detected Watersheds - Direct Impacts~~	~~Occurrence Not Detected Watersheds - Direct Impacts~~	~~Occurrence Detected Watersheds - Indirect Impacts~~	~~Occurrence Detected Watersheds - Direct Impacts [1]~~	~~Occurrence Detected Watersheds - Indirect Impacts [2]~~		
Intermittent Stream	1.10	-	-	-	-	-	0.00	~0.08
Vernal Pools	2.60	~~0.08~~	~~0.00~~	~~N/A~~	~~0.00~~	~~0.00~~	0.08	0.00
Seasonal Wetlands	1.38	~~0.14~~	~~0.00~~	~~N/A~~	~~0.00~~	~~0.00~~	0.14	0.00
Wetland Swales	~~7.80~~8.98	~~0.13~~	~~0.12~~	~~N/A~~	~~0.00~~	~~0.00~~	0.25	0.00
~~Swale Depressional~~	~~1.18~~	~~0.03~~	~~0.02[3]~~	~~N/A~~	~~0.00~~	~~0.00~~	-	-
~~**Total [4]**~~	~~**5.16**~~	~~**0.25**~~	~~**0.02**~~	~~**2.35[6]**~~	~~**0.00**~~	~~**0.00**~~	-	-
Total [5]	~~**11.78**~~ **14.05**	~~**0.35**~~	~~**0.12**~~	~~**2.35**~~	~~**0.00**~~	~~**0.00**~~	**0.47**	~~**~2.43[1]**~~

Source: Gibson & Skordal 2012a~~, and~~ 2012c and 2013a; Impact Sciences 2012
Note: Action Area is defined as the project site and the 250-foot band around the project site.
Numbers may not sum to total due to rounding.
~~*[1] Off-Site direct impacts are considered to be invertebrate habitat within a 30-foot band of the project site.*~~
~~*[2] Off-Site indirect impacts are considered to be invertebrate habitat between 30 feet and 250 feet of the project site.*~~
~~*[3] This number was estimated using the ratio of the acreage of swale depressional found within wetland swales in occurrence-detected watersheds for the Proposed Action.*~~
~~*[4] Total includes vernal pools, seasonal wetlands, and swale depressional habitat.*~~
~~*[5] Total includes vernal pools, seasonal wetlands, and wetland swale habitat.*~~
~~*[6]*~~[1] ~~*This acreage*~~*An additional 2.35 acres (0.95 hectares) is within 250 feet (76 meters) of development and therefore will be indirectly affected.*

The western spadefoot toad is not a federally listed species and is listed as a "species of concern" by the state of California. Furthermore, no western spadefoot toads were observed on the project site. Therefore, Impact BIO-6 analysis on Draft EIS page 3.4-76 has been revised as shown below and Mitigation Measure BIO-6 has been deleted. The changes are shown below:

Proposed Action	As noted above, the project site does contain habitat for western spadefoot, including vernal pools, seasonal wetlands, and adjacent upland habitat. The Proposed Action would directly affect vernal pools and seasonal wetlands, and it would develop the upland areas with urban uses. However, the western spadefoot was not detected in any of the on-site habitat. Therefore, the Proposed Action would not affect any habitat where the western spadefoot was detected. ~~In addition, the Proposed Action could indirectly affect western spadefoot habitat in the long term by adding impervious surfaces that could change the hydrology and geomorphology of the wetted areas.~~ This would be a **less than significant direct** effect. There would be **no indirect** effect. ~~**Mitigation Measure BIO-6** would minimize the potential for loss of individuals during site grading activities. In compliance with this mitigation measure, prior to earth moving, measures would be implemented to capture any adult or larval western spadefoot toads, or western spadefoot egg masses, and relocate them to suitable habitat. Additionally, i~~Implementation of the mitigation plan for loss of wetlands described under **Mitigation Measures BIO-1a** and **BIO-2b**, which require preservation and protection of existing vernal pools, would protect ~~individual~~ western spadefoot toad~~s~~ habitat by avoiding impacts on areas that are designated open space. **Mitigation Measure BIO-1a** would also require creation and preservation of wetlands both on-site and off-site. Ensuring no net loss of wetlands would provide protection of potential habitat for western spadefoot by preserving or enhancing and protecting habitat that is capable of supporting this species. Furthermore, pursuant to mitigation measures incorporated in the Proposed Action to address impacts to Swainson's hawk foraging habitat, more than 1,300 acres (526 hectares) of grassland habitat would be preserved. ~~All of t~~These measures would further reduce ~~potential~~ **direct** effects to this species ~~to **less than significant**~~.
Alts. 1 through 5	Similar to the No Action Alternative and the Proposed Action, Alternatives 1 through 5 would result in similar direct and indirect impacts on western spadefoot as described above for the Proposed Action. Based on the significance criteria and for the reasons presented above, the effect on western spadefoot would be **less than significant**. The same mitigation measures (~~**Mitigation Measure BIO-6,**~~ **Mitigation Measure BIO-1a, Mitigation Measure BIO-2b,** and mitigation for Swainson's hawk habitat impacts**)** would ~~mitigate~~ further reduce the effect. ~~With mitigation, the **direct** effects would be **less than significant**.~~

Off-Site Alt. The Off-Site Alternative and construction of the off-site infrastructure corridor would result in a similar **less than significant direct** effect on western spadefoot as described above for the Proposed Action. The same mitigation measures (**~~Mitigation Measure BIO-6, as well as~~ Mitigation Measures BIO-1a and BIO-2b)** would be implemented to mitigate the effects. With mitigation, the **direct** effects would be further reduced ~~**less than significant**~~. There would be **no indirect** effect.

~~**Mitigation Measure BIO-6: Relocate Western Spadefoot Toad**~~
~~***(Applicability – Proposed Action and All Alternatives)***~~[4]

~~*The location of pools that are occupied by western spadefoot toad shall be determined through surveys conducted during the appropriate season (generally February) by a qualified biologist. Those pools that are found to support western spadefoot toad shall be avoided if feasible. If avoidance is not feasible, the CDFW shall be consulted for its recommendation with respect to an adult or larval or egg masses capture and relocation plan.*~~

Table 3.4-21 on Draft EIS page 3.4-92 is revised as follows:

Table 3.4-21
Waters of the U.S. Impacts and Mitigation (in Acres)
based on Recent Permits Issued by the USACE in the Cumulative Study Area

Wetland Type	Total Impact	Total Mitigation	Total Mitigation without Preservation	On-Site Mitigation			Mitigation Banks within Study Area		Mitigation Banks Outside of Study Area[a]	
				Creation	Restored/ Enhanced	Preserved	Creation	Preservation	Creation	Preservation
Vernal Pools	147.55[b]	465.24	208.73	71.33	0	76.41	121.05	132.09	16.35	48.01
Other Waters of U.S.	291.38[c]	788.69	452.38	180.30	13.95[d]	296.36	231.68	39.95	26.45	0
Total	**438.93**	**1,253.93**	**661.11**	**251.63**	**13.95**	**372.77**	**352.73**	**172.04**	**42.8**	**48.01**
Total Delineated	1,099.51									

Note:
[a] *Includes mitigation sites that are in unknown locations*
[b] *Total impact does not include 0.87 acre of temporary impact to vernal pools.*
[c] *Total impact does not include 13.79 acres of temporary impact to other waters of the U.S.*
[d] *Includes 11.9 acres of restored and 2.05 acres of enhanced wetlands*

3.5 Climate Change

The second sentence at the top of Draft EIS page 3.5-10 is deleted as follows:

~~The PCAPCD must also ensure compliance with AB 32 reduction targets, and therefore has GHG reporting requirements similar to other air districts within California.~~

3.6 Cultural Resources

The third bullet point under Mitigation Measure CR-1b on Draft EIS page 3.6-15 is revised as follows:

- *Once the inventory is complete, the USACE ~~(or designee, as directed by the USACE)~~ shall prepare a ~~Finding~~ Determination of Effect ~~(FOE)~~ to assess the effect of the buildout of the individual development phase upon identified historic properties by applying the Criteria of Adverse Effect pursuant to 36 CFR 800.5(a) (1). If the ~~FOE~~USACE identifies adverse effects, the Applicant shall prepare treatment measures and protocols to minimize these impacts to the extent ~~possible~~feasible. These treatment measures shall be appended to the PA in a treatment plan prepared for the specific project development phase. Treatment measures may include, but are not limited to, avoidance and preservation in places where ~~possible~~feasible. Where avoidance is not ~~possible or~~ feasible, treatment shall consist of either: (1) recovery of a suitable sample of material from archaeological sites that have the potential to contribute to research, and/or (2) documentation of historic resources to capture their significance and relationship to important historical themes, complexes, or landscape setting. Documentation of historical resources shall be performed according to the Historic American Building Survey or Historic American Engineering Record (HABS/HAER) specifications or an equivalent standard when existing architecture or engineered features are subject to adverse effects. Where appropriate, treatment plans may specify the preparation and circulation of interpretive brochures, narrative descriptions, and photographic documentation for the general public.*

3.10 Hydrology and Water Quality

Impacts HYDRO-1 and HYDRO-2 starting on Draft EIS page 3.10-16 are revised to reflect the removal of the on-site floodplain storage. The revisions are as follows:

Impact HYDRO-1 Effect related to On- or Off-Site Flood Hazards

No Action Alt.	The No Action Alternative would avoid significant effects related to on-site flood risks. These **direct** and **indirect** effects are considered **less than significant**. Mitigation is not required. The No Action Alternative could contribute to off-site flooding in the sump area upstream from the Natomas Cross Canal–Pleasant Grove Canal confluence. This would be a **significant indirect** effect. Mitigation would reduce this **indirect** effect to **less than significant**. The project site is currently undeveloped. Development under the No Action Alternative would modify existing topography and drainage on the project site by grading to create pads for construction of residences and commercial development and to construct roadways. The No Action Alternative would construct a mixed-use development on the project site. Assuming the use of conventional hardscape,

buildout under the No Action Alternative would add approximately 272 acres (110 hectares) of impervious surface to the site, with approximately 125 acres (81 hectares) preserved as open space.

Flood flows from the increased impervious surfaces on the project site were not separately calculated for the No Action Alternative. As shown in **Table 3.10-3**, the Proposed Action would have the potential to increase peak flood flows in the West Plan tributary. The No Action Alternative would result in lower peak flows due to the smaller development footprint and lower amount of impervious surfaces. In compliance with the City's Design Guidelines, and the PCFCD SWMM, as part of the project, the No Action Alternative would also incorporate a number of features to provide safe conveyance of increased peak flows within the project site. In addition, ~~as part of the project~~ the No Action Alternative would include LID measures and preservation of the West Plan tributary floodplain as open space, which would ensure that it would not increase flood hazards to downstream areas (when considered in combination with other improvements planned for the West Plan tributary within the West Roseville Specific Plan area).

Water elevations were not separately calculated for the No Action Alternative. **Table 3.10-4** below compares pre-Proposed Action water surface elevations at selected locations along West Plan tributary during the 100-year flood with post-project 100-year water surface elevations at the same sites. Since post-project flows would increase, the reduction in water surface elevation in most locations reflects the effect of the increased flood storage provided within the West Roseville Specific Plan area ~~provided by the Proposed Action~~. ~~The No Action Alternative would create similar flood storage features.~~ Consequently, although ~~at buildout,~~ the No Action Alternative would modify site topography and add impervious surface at buildout, it would not result in significant effects related to on-site flood risks. These **indirect** effects would be **less than significant**. Mitigation is not required. There would be **no direct** effects.

On the more regional scale, with the peak flow management features described above in place, the No Action Alternative would satisfy the PCFCD SWMM requirement to avoid increasing the water surface elevation off-site. However, the increase in impervious surface associated with development of the currently undeveloped project site would increase the total volume of runoff that would be contributed to the Natomas Cross Canal in any given flood event. Flooding presently occurs in the sump area upstream from the Natomas Cross Canal–Pleasant Grove Canal confluence when the Sacramento River rises above a stage of 37.0 feet at the Verona Gauge, and additional runoff could increase the depth of flooding during this type of event (Civil Engineering Solutions 2011). The No Action Alternative would contribute to flooding in the sump area upstream of the

	Natomas Cross Canal–Pleasant Grove Canal confluence, this **indirect** effect is considered **significant**. The City is currently developing flood protection improvements to address flooding in the Natomas Cross Canal–Pleasant Grove Canal sump area through its Reason Farms flood storage project, which would construct a 2,530 acre-foot (312 hectare-meter) flood storage basin at Reason Farms to manage increased runoff from existing and planned (entitled) development in portions of the City that drain to the Natomas Cross Canal. This includes projects within the Curry Creek watershed. Construction of the Reason Farms basin could begin as early as 2014 and is expected to continue at the same rate of new development in the City. **Mitigation Measure HYDRO-1** would be implemented to address the downstream flooding effect. It requires the payment of the City's Pleasant Grove Watershed Mitigation Fee, which would provide a fair-share contribution toward the cost of the Reason Farms flood control project (City of Roseville 2010a). This measure is the same as Mitigation Measure WMM 4.12-2 in the Sierra Vista Specific Plan EIR. By contributing funds toward the construction of the Reason Farms flood storage project, the Sierra Vista Specific Plan EIR concluded that this mitigation measure would reduce the effect to a less than significant level (City of Roseville 2010a). The City of Roseville has a process in place to monitor the need for the flood storage project which will determine when the ~~detention~~ volumetric mitigation facility will be built. The start date for construction of the ~~flood storage~~ facility has not been decided. The USACE assumes that the City of Roseville would impose the same mitigation measure on the No Action Alternative to address this effect. The USACE agrees with the conclusion in the Sierra Vista Specific Plan EIR and finds that this **indirect** effect would be reduced to **less than significant**. **No direct** effects would occur.
Proposed Action	The Proposed Action would also avoid significant effects related to on-site flood risks. These **direct** and **indirect** effects are considered **less than significant**. Mitigation is not required. The Proposed Action could contribute to off-site flooding in the sump area upstream from the Natomas Cross Canal–Pleasant Grove Canal confluence. This would be a **significant indirect** effect. Mitigation would reduce this **indirect** effect to a **less than significant** level. As noted above, the project site is currently undeveloped. Development under the Proposed Action would modify existing topography and drainage on the project site and, assuming the use of conventional hardscape, buildout under the Proposed Action would add approximately 361 acres (146 hectares) of impervious surface to the site, with approximately 37 acres (15 hectares) preserved as open space. This increase in impervious surface would potentially increase peak storm flows, as

summarized in **Table 3.10-3** below.

Table 3.10-3
Pre- and Post-Project (Buildout) Peak Storm Flows, With and Without Stormwater Measures

Stream Station	Location	10-Year Peak Flow (cfs)				100-Year Peak Flow (cfs)			
		Pre-Project	Buildout no LID Measures	Buildout with LID Measures	Net Change*	Pre-Project	Buildout no LID Measures	Buildout with LID Measures	Net Change*
Curry Creek - West Plan Tributary									
69	West Plan Tributary Enters Project Area	220	402	198	-22	562	838	543	-19
73.3	South Fork Enters Project Area	127	121	121	-6	256	255	255	-1
65	At Confluence, Upstream of Existing Culvert	280	472	241	-39	574	932	534	-40
61	Downstream of Project Boundary	237	310	211	-26	457	527	402	-55

Source: Civil Engineering Solutions, Inc. 2011
** Net change refers to the difference between buildout with stormwater detention and floodplain storage in place and pre-project conditions.*
cfs = cubic feet per second

As shown in **Table 3.10-3**, the Proposed Action would have the potential to increase peak flood flows over much of the site length of the drainages. However, consistent with the requirements of the City's Design Guidelines, the Sierra Vista Specific Plan, and the PCFCD SWMM, the Proposed Action would incorporate a number of features as part of the project to provide safe conveyance of increased peak flows within the project site. The Proposed Action would include LID measures and the preservation of the West Plan tributary floodplain as open space, which would ensure that it would not increase flood hazards to downstream areas. **Table 3.10-3** also compares pre-project peak flows with (1) post-project flows at buildout without implementing LID measures or preserving open space ~~for floodplain storage~~ and (2) post-project flows at buildout with the proposed stormwater detention and ~~floodplain storage in place~~open space preservation. **Table 3.10-4** below compares pre-project water surface elevations at selected locations along West Plan tributary during the 100-year flood with post-project 100-year water surface elevations at the same sites. Since post-project flows would increase, the reduction in water surface elevation

in most locations reflects the effect of the increased flood storage provided along the West Plan tributary within the West Roseville Specific Plan area~~by the Proposed Action~~.

Table 3.10-4
Pre- and Post-Project Water Surface Elevations

Station	Location	Pre-Project 100-Year Water Surface (HGL)	Post-Project 100-Year Water Surface (HGL)	Change in Water Surfac (feet)
Curry Creek - West Plan Tributary				
69.0	Upstream Boundary	82.20	81.84	- 0.36
73.3	Upstream Limit of South Fork (on-site)	82.11	82.06	- 0.05
63	Downstream of Project Boundary	82.01	81.74	- 0.27

Source: Civil Engineering Solutions, Inc. 2011
HGL = Hydraulic Grade Line

~~With the added floodplain storage features in place, peak 2-year, 10-year, and 100-year storm flows on the project site, and peak flows delivered off-site in these events, would decrease in comparison to existing conditions. The project plan would create 18 acre-feet of additional storage within the 100-year floodplain.~~ The City has determined that adequate storm water detention capacity has been developed upstream of the Westbrook project site within the West Roseville Specific Plan area. The project will provide the limited additional storm water detention capacity that is needed by expanding the existing bioswale located off-site along the project's northeastern boundary. Consequently, although ~~at buildout,~~ the Proposed Action would modify site topography and add impervious surface at buildout, it would not result in significant effects related to on-site flood risks. These **direct** and **indirect** effects would be **less than significant**. Mitigation is not required.

The Westbrook project envisions that the development on the project site would take place in a phased manner, and provides for backbone infrastructure, including storm water management, to be phased along with residential and commercial development. As development proceeds, residential or commercial improvements on individual parcels would be identified in more detail as Small Lot Tentative Maps or subsequent entitlements are approved. The approvals process at the parcel level will require further evaluation of peak flow discharges and storm water management requirements in light of the parcel-specific proposals, and if

	additional mitigation is identified as necessary, it will be implemented through the City approval process. Additional mitigation at the parcel-specific or phase level cannot feasibly be designed at this time, and may not be needed, but if needed, will be enforced by the City under its existing permit review process. The ~~Proposed Action~~ stormwater detention capacity provided under the Proposed Action in the expanded bioswale adjacent to the project site and detention facilities in the West Roseville Specific Plan area would reduce peak flows. ~~, but~~ The Proposed Action would nonetheless generate substantially more runoff from the project site which would contribute to flooding in the sump area upstream of the Natomas Cross Canal–Pleasant Grove Canal confluence and based on the significance criteria regarding on- and off-site flood hazards and for the same reasons detailed under the No Action Alternative listed above, this **indirect** effect is considered **significant**. **Mitigation Measure HYDRO-1** would address this effect. As noted above, this measure is the same as Mitigation Measure WMM 4.12-2 in the Sierra Vista Specific Plan EIR and was incorporated into the project at the time that the City approved the Westbrook project. Implementation of this mitigation measure would reduce the **indirect** effect to **less than significant**. **No direct** effect would occur.
Alts. 1 through 5	All of the on-site alternatives would construct a moderate scale, mixed-use project on the project site. As the total amount of development on the site and resultant impervious surfaces would be approximately 22 to 38 percent ~~fewer~~ less than the Proposed Action under all five on-site alternatives, the alternatives would have the potential to increase peak flows along the drainages by a smaller amount than the Proposed Action. Similar flood ~~flow storage~~detention features would be included in each alternative and, therefore, Alternatives 1 through 5 would also result in a **less than significant direct** and **indirect** effect related to on-site flooding. No mitigation is required. The five on-site alternatives would contribute to flooding in the sump area upstream of the Natomas Cross Canal–Pleasant Grove Canal confluence and based on the significance criteria listed above regarding on- and off-site flood hazards and for the same reasons presented above for the No Action Alternative, this **indirect** effect is considered **significant**. **Mitigation Measure HYDRO-1** would address this effect. As noted above, this measure is the same as Mitigation Measure WMM 4.12-2 in the Sierra Vista Specific Plan EIR. The USACE assumes that the City of Roseville would impose the same mitigation measure on the on-site alternatives to address this effect, and for the reasons presented above, the implementation of this mitigation measure would reduce

	the **indirect** effect to **less than significant**. **No direct** effect would occur.
Off-Site Alt.	The Off-Site Alternative would construct a moderate scale, mixed-use project on the alternative site. In addition, the Off-Site Alternative would require the installation of off-site infrastructure consisting of water, recycled water and sewer lines, and roadway improvements. The total amount of impervious surfaces that would be developed on the alternative site would be less than under the Proposed Action. Flood flow detention basins would be built off-site to handle the increase in storm water and reduce peak flows. As a result, the Off-Site Alternative would not result in significant effects related to on-site flooding and these **direct** and **indirect** effects would be **less than significant.** No mitigation is required. Similar to the No Action Alternative, Proposed Action, and other alternatives listed above, storm water from the Off-Site Alternative site would discharge into the Natomas Cross Canal and would contribute to flooding events in the sump area upstream of the Natomas Cross Canal–Pleasant Grove Canal confluence. Based on the significance criteria listed above regarding on- and off-site flood hazards and for the same reasons presented above for the Proposed Action, this **indirect** effect would be **significant**. The USACE assumes that the City would impose a mitigation measure similar to **Mitigation Measure HYDRO-1** on this alternative and that the measure would reduce the **indirect** effect to a **less than significant** level. **No direct** effect would occur.
Mitigation Measure HYDRO-1:	**Payment of Drainage Impact Fees** ***(Applicability – No Action, Proposed Action and All Alternatives)***

The City shall collect the Pleasant Grove Drainage Fee from the Applicant prior to the approval of each building permit, which would cover the cost of retention for that development's portion of the Roseville regional retention basin at Reason Farms.

Impact HYDRO-2 Effects from Construction within a Floodplain

No Action Alt.	Construction within a floodplain area can be of concern because it has the potential to impede flood conveyance and/or redirect flood flows, and can exacerbate existing flood hazards or create new hazards in areas not presently subject to flooding. As discussed in the **Affected Environment** above, no portion of the project site is within the City's Regulatory Floodplain. As shown in **Figure 3.10-1**, a portion of the project site is within a 100-year floodplain. This comprises the West Plan tributary corridor that crosses the northwestern corner of the project site. Under the No Action

	Alternative, the entire 100-year floodplain would be included in an area that is designated open space on the No Action Alternative land use diagram. As a result, no major structures would be placed within this area although minor localized construction, such the construction of a trail, could take place within the open space area. Because flood flows would not be impeded or redirected in a hazardous manner by this limited construction, this **direct** effect would be **less than significant**. Mitigation is not required. **No indirect** effect would occur.
Proposed Action	Compared to the No Action Alternative, the Proposed Action would construct a larger mixed-use development on the project site. However, no structures would be constructed within the 100-year floodplain and ~~a trail is constructed in the open space area,~~ the Proposed Action would also not substantially impede or redirect flood flows. ~~The Proposed Project would modify the boundaries of the 10- and 100-year floodplains by building a floodplain expansion area to accommodate additional stormwater flows but this change would help reduce flooding and would not redirect flood flows.~~ Based on the significance criteria listed above regarding construction in a floodplain that could impede or redirect floodwaters and for the same reasons presented above for the No Action Alternative, this **direct** effect would be **less than significant.** Mitigation is not required. **No indirect** effect would occur.
Alts. 1 through 5	Under each on-site alternative, no major structures would be constructed within the 100-year floodplain and no project feature would substantially impede or redirect flood flows. Based on the significance criteria listed above regarding construction in a floodplain that could impede or redirect floodwaters and for the same reasons presented above for the No Action Alternative, this **direct** effect would be **less than significant** for all of the on-site alternatives**.** Mitigation is not required. **No indirect** effect would occur.
Off-Site Alt.	A 100-year floodplain is not present on the alternative site. No major structures would be constructed within the City's Regulatory Floodplain and no project feature would substantially impede or redirect flood flows. Based on the significance criteria listed above regarding construction in a floodplain that could impede or redirect floodwaters and for the same reasons presented above for the No Action Alternative, this **direct** effect would be **less than significant** for the Off-Site Alternative. Mitigation is not required. **No indirect** effect would occur.

3.11 Land Use and Planning

The last sentence of the second paragraph under *Existing and Planned Land Uses in the Vicinity of Project Site* on Draft EIS page 3.11-2 is revised as follows:

A majority of the lands to the west are associated with the Regional University ~~and Community~~ Specific Plan, which is a County-approved project comprising approximately 1,100 acres (445 hectares) and consisting of two components – a 600-acre (243-hectare) area designated for a private university campus and a 558-acre (226 hectare) community designated for residential and commercial uses.

3.12 Noise

Neither the Proposed Action nor the alternatives include a community-wide park. Therefore, the analysis of impacts on *Parks* under Impact NOISE-2 on Draft EIS page 3.12-14 has been revised and Mitigation Measure NOISE-2b has been deleted as it is not required. The changes are shown below:

No Action Alt.

Parks

The No Action Alternative would include four neighborhood parks that would be adjacent to residential and open space uses. Neighborhood parks are defined as a landscaped park designed to serve a concentrated population or neighborhood. They are often developed as a recreation facility with a balance of passive and active recreation areas. Typical improvements are play areas, picnic table, athletic fields, multi-use turf, hard courts, natural areas, pathways, and security lighting. No athletic field lights are provided.

~~Children playing at neighborhood parks could be considered potentially significant noise sources which may adversely affect adjacent noise-sensitive land uses. Typical noise levels associated with groups of approximately 50 children playing at a distance of 50 feet (15 meters) generally range from 55 to 60 dB Leq, with maximum noise levels ranging from 70 to 75 dB. It is expected that the playground areas would be used during daytime hours. Therefore, noise levels from the playgrounds would need to comply with the City of Roseville 50 dB Leq and 70 dB Lmax exterior noise level standards at the nearest residential uses. Based upon the typical noise level data discussed above, the 50 dB Leq noise contour would be located approximately 158 feet from the center of playgrounds. The 70 dB Lmax contour would be located approximately 90 feet from the center of playgrounds (J.C. Brennan & Associates 2011).~~

~~Given the proximity of most parks to residential uses, the potential for exceedance of the City of Roseville noise standards exists depending on the orientation and proximity of the play areas to the nearest residences, the number of children using the play areas at a given time, and the types of activities the children are engaged in.~~ Although the noise resulting from the use of neighborhood parks has potential to exceed the City of Roseville noise standards for residential uses in the nearby residential areas, due to the passive nature of parks, the City concluded that neighborhood parks are compatible with residential uses and significant noise impacts on residences would not occur. The USACE concurs with the City's

conclusion and finds that ~~This~~ the **indirect** effect is ~~potentially~~ **less than significant**.

~~If park areas are separated from residential uses by local roadways, mitigation would not be required. However, where neighborhood parks abut residential uses, a 6-foot tall sound wall, or 160-foot setback to play areas, as required by **Mitigation Measure NOISE-2b,** would reduce the effects to less than significant. This measure is excerpted from Mitigation Measure 4.6-3 in the Sierra Vista Specific Plan EIR. The USACE assumes that the City would impose this mitigation measure on the No Action Alternative. By reducing noise from parks, the Sierra Vista Specific Plan EIR determined that this mitigation measure would reduce the effect to less than significant (City of Roseville 2010). The USACE agrees with the conclusion in the Sierra Vista Specific Plan EIR and finds that with mitigation, this **indirect** effect would be reduced to **less than significant**.~~ **No direct** effects would occur.

Proposed Action, Alts. 1 through 5

Parks

Similar to the No Action Alternative, ~~given the proximity of parks to residential uses, there is potential for exceedance of the City of Roseville noise standards under~~ the Proposed Action and all of the on-site alternatives~~, which~~ would result in a **less than significant indirect** effect related to noise from neighborhood parks.

~~**Mitigation Measure NOISE-2b** would address this effect. As noted above, this measure is excerpted from Mitigation Measure 4.6-3 in the Sierra Vista Specific Plan EIR which was adopted by the City of Roseville at the time of Westbrook project approval and will be enforced by the City. The USACE assumes that the City of Roseville would impose the same mitigation measure on all of the on-site alternatives to address this effect. By reducing park-related noise levels at the nearest sensitive receptors, this mitigation measure would reduce the **indirect** effect to **less than significant.**~~ **No direct** effects would occur.

Off-Site Alt.

Parks

~~Given the proximity of parks to residential uses, depending on the orientation and proximity of the play areas to the nearest residences, noise from the neighborhood parks could result in an~~ The City of Roseville determined that residences and neighborhood parks are compatible. Therefore, any potential exceedance of the City of Roseville noise standards at the nearby residences would be a less than significant impact. The USACE concurs and finds that the Off-Site Alternative~~, which~~ would ~~be~~result in a **less than significant indirect** effect. ~~The USACE assumes that the City of Roseville would impose **Mitigation Measure NOISE-2b** on the Off-Site Alternative and finds that the mitigation measure would reduce the **indirect** effect to **less than significant.**~~ **No direct** effects would occur.

~~**Mitigation Measure NOISE-2b: Attenuate Park Noise**~~

~~***(Applicability – No Action, Proposed Action, and All Alternatives)***~~

- ~~*Activities at the proposed community-wide park shall be scheduled to occur during daytime hours (7:00*~~

~~*AM to 10:00 PM).*~~

- ~~*Public address (PA) systems shall be designed, installed, and tested to comply with the requirements of the City of Roseville Municipal Code Noise Ordinance at the nearest sensitive receptors.*~~
- ~~*Wood fencing, or 160-foot (49 meters) setbacks adjacent to active recreation areas, shall be included in the project design where neighborhood parks abut residential uses.*~~

The last bullet in Mitigation Measure NOISE-3 on page 3.12-25 has been deleted as it does not apply to the Proposed Action or any of the alternatives:

- ~~*Tentative map applications for residential uses located along Fiddyment Road shall be required to include an analysis of interior noise levels. The report shall be prepared by a qualified acoustical engineer and shall specify the measures required to achieve compliance with the City of Roseville 45 dB Ldn interior noise level standard.*~~

3.13 Public Services

The last paragraph of the Proposed Action and Alternatives 1 through 5 analysis under Impact PUB-3 on Draft EIS page 3.13-14 is revised as follows:

No Action Alt.	The buildout of the No Action Alternative would increase the number of elementary, middle, and high school students in the area. The land use plan for the No Action Alternative provides a site for an elementary school. It is anticipated that the on-site school would serve the elementary school students associated with the No Action Alternative. With respect to the impact on other schools in the area from the additional school children associated with the No Action Alternative, the addition of these children could require the hiring of additional teachers and staff and construction of additional classrooms at the affected schools. According to state law (SB 50), all impacts of new development on schools shall be mitigated by payment of school impact fees. School impact fees are collected at the time building permits are issued. These fees are used by the local schools to accommodate the new students added by the project, thereby reducing potential impacts on schools. Payment of school impact fees is considered full and complete mitigation of school impacts under state law. Consistent with City policy**,** the Applicant would be required to enter into mutual benefit impact fee agreements with the school districts to pay for the development of the new schools proposed under the No Action Alternative. With payment of school impact fees which are required of and a part of all new development, the No Action Alternative would not substantially impede the provision of school services to other areas or adversely affect the provision of school services to the project site or to the surrounding areas. Therefore, the No Action Alternative would have a **less than significant indirect** effect on schools and mitigation is not required. **No direct** effects would occur.

Proposed Action, Alts. 1 through 5	The generation of students on the project site under the Proposed Action and all on-site alternatives could exceed the capacities of existing and proposed schools in the area. In particular, as buildout of the Proposed Action and all on-site alternatives would occur between 15 and 30 years depending on market conditions, schools in the area that currently have excess capacity could have inadequate capacity when some of the later phases of development on the site occur. As explained above under the No Action Alternative, consistent with City policy ~~and as required by state law~~, the Applicant would enter into school fee agreements with all three school districts to pay impact fees to fully mitigate effects of the development on the school districts. The collected fees would be used by the affected school districts to provide the necessary facilities. Therefore, with adequate funding provided through the payment of school impact fees, the Proposed Action and all on-site alternatives would not substantially impede the provision of school service to other areas or adversely affect the provision of school services to the project site or to the surrounding areas. The **indirect** effect on schools would be **less than significant**. No mitigation is required. **No direct** effects would occur.
Off-Site Alt.	Under the Off-Site Alternative, the mixed-use community would be located within the boundaries of the RCSD/RJUHSD. This alternative would include development of one elementary school to serve the residential development. As stated above, school capacities could be inadequate, especially during later phases of development on this site. As required by ~~state law and~~ City policy, the Applicant would enter into school fee agreements with the affected school district to fully mitigate school effects. The collected fees would be used by the affected school districts to provide the necessary facilities. With adequate funding provided through the payment of school impact fees, the alternative would not substantially impede the provision of school service to other areas or adversely affect the provision of school services to the project residents or to the surrounding areas. The **indirect** effect on schools would be **less than significant**. No mitigation is required. **No direct** effects would occur.

3.14 Transportation and Traffic

Impact TRA-1 and Mitigation Measure TRA-1 on Draft EIS page 3.14-24 are revised as follows:

Impact TRA-1 Increased Traffic at City of Roseville Intersections

No Action Alt.	The No Action Alternative would cause two intersections in the City of Roseville to operate at LOS F during the PM peak hour. Mitigation is identified in this EIS to reduce these effects. However, due to the infeasibility of improvements at these affected intersections, residual **significant indirect** effects would remain after mitigation. **No direct** effects would occur. The No Action Alternative would result in the development of the project site with a variety of land uses, including residential and commercial uses. As indicated in **Tables**

	3.14-9 and **3.14-10** (at the end of this section), two intersections in the City of Roseville would operate at LOS F under 2025 plus No Action Alternative conditions during the PM peak hour. A description of each intersection affected along with a discussion of proposed improvements that would mitigate the impact is provided below: • **Blue Oaks Boulevard and Diamond Creek Boulevard** – Under 2025 plus No Action Alternative conditions, this intersection would degrade from LOS E to LOS F during the PM peak hour. This would be a **significant** effect, prior to mitigation. Modifying this intersection to include a separate southbound right turn lane would restore the operation of the intersection to LOS E. However, the City of Roseville may not consider this improvement to be feasible due to adjacent sidewalks and landscaping. • **Pleasant Grove Boulevard and Fiddyment Road** – Under 2025 plus No Action Alternative conditions, this intersection would degrade from LOS E to LOS F during the PM peak hour. This would be a **significant** effect, prior to mitigation. Modifying this intersection to include three east bound through lanes, two westbound to southbound left turn lanes, and two westbound through lanes would improve the operation of the intersection to LOS C. However, the City of Roseville may not consider this improvement to be feasible. **Mitigation Measure TRA-1,** which would require payment of the fair share of the cost of the improvements, would address this effect. **Mitigation Measure TRA-1** is ~~the same as~~ similar to Mitigation Measure 4.3-1 in the Sierra Vista Specific Plan EIR in that it requires payment of the fair share of the cost of necessary improvements to the affected intersections, although Mitigation Measure 4.3-1 requires fair share payments for other intersections and not the two intersections listed above (this difference in location of significant impacts is because the City's traffic analysis assumed that the Sierra Vista street system would be available for Westbrook project trips to travel to and from Baseline Road, whereas the traffic analysis for the Westbrook Draft EIS did not assume that those roadways would be available because the SVSP project has not yet received USACE approval. Consequently the traffic analysis in the Westbrook Draft EIS added all Westbrook project trips to existing roadways, mainly Pleasant Grove Boulevard). The USACE assumes that the City would impose this mitigation measure on the No Action Alternative. However, as noted above, the City of Roseville may not consider the proposed improvements feasible. Therefore, the **indirect** effect would be **significant** (City of Roseville 2010). The USACE agrees with the conclusion in the Sierra Vista Specific Plan EIR and finds that with this mitigation, this **indirect** effect would remain **significant. No direct** effects would occur.
Proposed Action	The Proposed Action would cause two intersections in the City of Roseville to operate at LOS F during the PM peak hour. Mitigation is identified to address these effects.

	However, due to the potential infeasibility of the mitigation, the **indirect** effects would remain **significant**. **No direct** effects would occur. The Proposed Project would construct a larger mixed-use development on the project site, compared to the No Action Alternative. As indicated in **Tables 3.14-9** and **3.14-10**, the same two intersections that would degrade from LOS E to LOS F under the No Action Alternative would degrade from LOS E to LOS F under the Proposed Action. Based on the significance criteria listed above and for the same reasons presented above for the No Action Alternative, these **indirect** effects would be **significant**. **Mitigation Measure TRA-1** is ~~the same as~~ similar to Mitigation Measure 4.3-1 in the Sierra Vista Specific Plan EIR in that it requires payment of the fair share of the cost of necessary improvements to the affected intersections, although Mitigation Measure 4.3-1 requires payment of fair share for other intersections and not the two intersections listed above. ~~However,~~ A~~a~~s noted above, the City of Roseville may not consider the proposed improvements feasible. Therefore, the **indirect** effect would be **significant** (City of Roseville 2010). The USACE agrees with the conclusion in the Sierra Vista Specific Plan EIR and finds that with this mitigation, this **indirect** effect would remain **significant. No direct** effects would occur.
Alts. 1 through 5	All of the on-site alternatives would construct a smaller mixed-use development on the project site compared to the Proposed Action. As indicated in Tables 3.14-9 and 3.14-10, with the exception of Alternative 2, the on-site alternatives would cause the intersection of Blue Oaks Boulevard and Diamond Creek Boulevard to degrade from LOS E to LOS F during the PM peak hour. In addition, the intersection of Pleasant Grove Boulevard and Fiddyment Road would degrade from LOS E to LOS F during the PM peak hour under all of the on-site alternatives. Based on the significance criteria listed above and for the same reasons presented above for the No Action Alternative, these indirect effects would be significant. No direct effects would occur. Mitigation Measure TRA-1 is ~~the same as~~ similar to Mitigation Measure 4.3-1 in the Sierra Vista Specific Plan EIR in that it requires payment of the fair share of the cost of necessary improvements to the affected intersections, although Mitigation Measure 4.3-1 requires fair share payments for other intersections and not the two intersections listed above. The USACE assumes that the City would impose this mitigation measure on Alternatives 1 through 5. However, as noted above, the City of Roseville may not consider the proposed improvements feasible. Therefore, the indirect effect would be significant (City of Roseville 2010). The USACE agrees with the conclusion in the Sierra Vista Specific Plan EIR and finds that with this mitigation, this indirect effect would remain significant. No direct effects would occur.
Off-Site Alt.	The Off-Site Alternative would cause one intersection in the City of Roseville to operate at LOS D during the AM peak hour and one intersection in the City of Roseville to

operate at LOS F during the PM peak hour. Mitigation is identified to address these effects. However, due to the infeasibility of mitigation, the indirect effects would remain significant. No direct effects would occur.

The Off-Site Alternative would construct a project broadly similar to the Proposed Action on the alternative site. Based on the significance criteria listed above and as indicated in Table 3.14-10, the intersection of Blue Oaks Boulevard & Diamond Creek Boulevard would degrade from LOS E to LOS F during the PM peak hour under this alternative (The same intersection would degrade from LOS E to LOS F under the No Action Alternative). This represents a significant indirect effect. As shown above under the No Action Alternative, feasible improvements are potentially unavailable for this intersection.

In addition, as shown in Table 3.14-9, one other intersection (Blue Oaks and Crocker Ranch) would degrade from LOS C to LOS D during the AM peak hour under this alternative based on the significance criteria listed above. A description of this effect along with a discussion of potential improvements is provided below:

- Blue Oaks Boulevard and Crocker Ranch Road – Under 2025 plus Off-Site Alternative conditions, this intersection would degrade from LOS C to LOS D. This would be a significant effect, prior to mitigation. Re-striping to include two southbound to eastbound left turn lanes and a separate right turn lane would improve the intersection to LOS B. This improvement would need to be added to the City's CIP and development within the Westbrook project would be required to pay fair share costs for this improvement.

Mitigation Measure TRA-1 would address this effect. It is ~~the same as~~ similar to Mitigation Measure 4.3-1 in the Sierra Vista Specific Plan EIR in that it requires payment of the fair share of the cost of necessary improvements to the affected intersections, although Mitigation Measure 4.3-1 requires payment of fair share for other intersections and not the two intersections listed above. The USACE assumes that the City would impose this mitigation measure on the ~~No Action~~ Off-Site Alternative. However, as noted above, the City of Roseville may not consider the proposed improvements feasible. Therefore, the indirect effect would be significant. ~~The USACE agrees with the conclusion in the Sierra Vista Specific Plan EIR and finds that even with this mitigation, this indirect effect would remain significant.~~ No direct effects would occur.

Mitigation Measure TRA-1: **Pay fair share of the improvements to City of Roseville intersections**
(*Applicability – No Action, Proposed Action, and All Alternatives*)

Pay Fair Share of Improvements in the CIP including improvements to the following intersections:

- *Fiddyment/Baseline Road: improve intersection as part of the project*

- *Watt Avenue/Baseline Road: improve intersection as part of the project*
- *Baseline Road: widen to four-lane facility from Fiddyment Road to western Specific Plan Boundary.*

Improvements would be necessary to the following intersections, as part of the project to achieve acceptable service levels under the 2025 CIP plus Project scenario. However, as noted, many intersections cannot be mitigated because of constraints.

1. *Foothills Boulevard and Baseline Road: No feasible mitigation*
2. *Industrial Avenue and Alantown Drive: No feasible mitigation*
3. *Cirby Way and Northridge Drive: No feasible mitigation*
4. *Foothills Boulevard and Junction Boulevard: No feasible mitigation*
5. *Junction Boulevard and Baseline Road: No feasible mitigation*
6. *Roseville Parkway and Sierra College Boulevard: No feasible mitigation*
7. *Blue Oaks Boulevard and Crocker Ranch Road: Re-stripe to include two south bound to east bound left turn lanes and a separate right turn. This improvement will be added to the City of Roseville's Capital Improvement program. Development within the ~~Sierra Vista Specific Plan Area~~Westbrook project area will be required to pay fair share costs for this improvement*
8. *Blue Oaks Boulevard and New Meadow Drive: Re-stripe the southbound through lane to a shared through and left-turn lane. This improvement will be added to the City of Roseville's Capital Improvement program. Development within the ~~Sierra Vista Specific Plan Area~~Westbrook project area will be required to pay fair share costs for this improvement. As such, this impact would be reduced to less than significant.*
9. *Foothills Boulevard and Baseline/Main: No feasible mitigation*
10. *Sunrise Boulevard and Sandringham/Kensington: add a dedicated southbound right-turn lane*
11. *Woodcreek Oaks and Baseline Road: construction of a second eastbound through lane. This improvement is currently in the City's CIP program. ~~SVSP~~Westbrook project would be required to pay fair share costs for this improvement.*

The ~~SVSP~~Westbrook project will develop over a period of years. Therefore, the impacts on these intersections would occur over a period of time. As with other improvements in the 2025 CIP, the City will monitor traffic conditions and determine when specific improvements are needed. The City of Roseville's traffic impact fees should be revised to include the ~~SVSP~~Westbrook project area. Specific Plans and/or development proposals shall provide for fair share contributions of the cost of the improvements through the updated traffic impact fees.

Construction of intersection improvements could have impacts on biological and cultural resources, air quality, water quality, and noise levels. These impacts will be evaluated as part of the CIP update to incorporate the adopted mitigation.

4.0 Other Statutory Requirements

The second to last sentence on Draft EIS page 4.0-1 is revised as follows:

Title 24 of the California ~~Administrative Code~~Code of Regulations regulates the amount of energy consumed by new development for heating, cooling, ventilation, and lighting purposes.

4.0 REFERENCES

City of Roseville. 2002. *Draft EIR for the City of Roseville Retention Basin Project*. October 16.

Gibson & Skordal, LLC. 2013a. *Biological Assessment for the Westbrook Project*. August.

Gibson & Skordal, LLC. 2013b. *Final Mitigation Plan for the Westbrook Project*. August.

J.C. Brennan & Associates. 2011. *Environmental Noise Assessment: Westbrook Property Technical Noise Section.* Prepared for City of Roseville. October 4.

5.0 LIST OF PREPARERS

5.1 U.S. ARMY CORPS OF ENGINEERS

Name	Title	Experience
Nancy A. Haley	Chief, California North Branch, Regulatory	20 years USACE Environmental
James T. Robb	Senior Project Manager	3 years USACE Environmental
Kathy Norton	Ecologist/Senior Project Manager	24 years USACE Environmental
Erin Hess	Cultural Resources Specialist	12 years USACE Environmental

5.2 IMPACT SCIENCES, INC.

Name	Qualifications	Participation
Shabnam Barati	B.A., M.A, M.Phil., Ph. D., 25 years of experience	Project Manager
Jennifer Millman	B.S., 5 years of experience	Deputy Project Manager, Environmental Justice , Hazards and Hazardous Materials, Noise, Public Services
Paul Stephenson, AICP	B.S., M.A., 8 years of experience	Aesthetics, Agricultural Resources, Biological Resources, Land Use, Transportation and Traffic
Caitlin Gilleran	B.S., 2 years of experience	Cultural Resources, Geology, Soils, and Minerals, Hydrology and Water Quality, Public Services, Cumulative
Eric Bell	B.S., M.S., 7 years of experience	Air Quality, Climate Change
Ian Hillway	B.S., 16 years of experience	Editing, Publications, Graphics

5.3 SUBCONSULTANTS

Name	Qualifications	Participation
David M. Tokarski, DKS Associates	B.S., M.S., 16 years of experience	Transportation and Traffic
Jeff Glazner, Salix Inc.	B.S., 22 years of experience	Biological Resources
Matt Fremont, Helix Environmental	B.A., M.A., 10 years of experience	Biological Resources (GIS)

APPENDIX A

Final Mitigation Plan

FINAL MITIGATION PLAN

Westbrook

Gibson & Skordal, LLC
WETLAND CONSULTANTS
2617 K Street, Suite 175
Sacramento, California 95816

FINAL MITIGATION PLAN

Westbrook

Prepared for:

Westpark S.V. 400, LLC
1420 Rocky Ridge Drive, Suite 265
Roseville, California 95661
Contact: Jeff Jones
(916) 774-3400

Prepared by:

Tom Skordal
Gibson & Skordal, LLC
2617 K Street, Suite 175
Sacramento, California 95816
(916) 822-3230

August 2013
Revised February 2014

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Chapter 1
Summary

The purpose of this document is to describe the mitigation measures proposed as compensation for the impacts to wetlands and other waters of the U.S. that would result from construction of the proposed Westbrook Project (the "Project"). The mitigation proposed herein is also intended to provide mitigation to assure that the project does not jeopardize the continued existence of any federally-listed threatened and endangered species, however, the specifics of impacts to federally-listed species is being specifically discussed in a separate Biological Assessment and is not addressed in this plan.

This plan was prepared consistent with the Corps of Engineers' ("Corps") and Environmental Protection Agency's ("EPA") regulations (the "Mitigation Guidelines") regarding compensatory mitigation for losses of aquatic resources (Corps of Engineers and Environmental Protection Agency 2008). The format of this document follows the Sacramento District Corps of Engineers' Habitat Mitigation and Monitoring Proposal Guidelines (Corps of Engineers 2004).

The proposed mitigation provides for a combination of on-site and off-site wetlands preservation and on-site and off-site wetlands creation and restoration. A total of 2.9830 acres of wetlands would be preserved on-site. A total of 22.62 acres of vernal pool preservation credits would be purchased from an approved mitigation bank within its approved service area. A total of 0.873

acres of vernal pool restoration credits would be acquired from the Toad Hill Mitigation Bank. A maximum total of 16.831 acres of riparian and freshwater marsh complex creation credits and/or seasonal wetland creation credits would be acquired from the River Ranch Wetlands Mitigation Bank and/or the Toad Hill Mitigation Bank. The actual number of wetland creation credits will depend on the number of credits purchased from which mitigation bank.

Chapter 2
Project Description

Responsible Parties

This mitigation plan is being proposed by Westpark S.V. 400, LLC ("Applicant") for Department of the Army Section 404 Permit to authorize fill in waters of the United States (U.S.) associated with the Project.

Location of Project

The ± 400-acre project area is located in the northwestern portion of the City of Roseville, Placer County, California. It is situated approximately 1.2 miles north of Baseline Road and one mile west of Fiddyment Road. Sheet 1 of 5 of the application drawings (Appendix A) is a vicinity map showing the location of the project area.

Description of the Proposed Project

The Project is a 400-acre mixed-use residential development. Sheet 3 of 5 of the application drawings (Appendix A) depicts the land plan for the Project. A mixture of land uses are planned, providing opportunities for development of new residential neighborhoods, an elementary school, parks, and several retail centers. The Project includes approximately 146 acres of low-density residential and 84

acres of medium-density residential, providing for approximately 1,340 single-family detached homes. In addition, approximately 28 acres is planned as high-density residential providing for 689 multi-family units. Of the Project's 2,029 total residential units, 10% (203 units) are set aside as affordable to very-low, low-, and moderate-income households.

Approximately 43 acres of commercial land uses are proposed, providing for development of approximately 565,000 sq. ft. of retail/office uses at several locations along Santucci Boulevard and Pleasant Grove Boulevard. Other proposed uses include a 10-acre elementary school site, approximately 16 acres for three neighborhood parks, and nearly 36 acres of open space for the preservation of natural resource areas. In addition to these uses, Westbrook provides for development of several paseos and Class I bike paths, providing an interconnected system of multi-use trails for pedestrians and cyclists to move through the plan area. Table 1 summarizes the proposed land uses comprising the Project and their respective areas.

Table 1. Summary of Proposed Land Uses and Their Areas

Land Use	***Gross Area (ac)***	***Net Area (ac)***	***Dwelling Units***
Low Density Residential	145.7	140.9	705
Medium Density Residential	83.6	79.4	635
High Density Residential	27.6	25.2	689
Commercial	43.3		
School	10.0		
Well Site	0.3		
Parks	15.5		
Open Space	36.6		
Major Roads	34.8		
Totals	**397.4**	**245.5**	**2,029**

Chapter 3
Description of Impacts to Aquatic Resources

Existing Resources

General Site Characteristics

The project site is characterized by gently rolling topography and large, open annual grassland areas. All of the project area has been disked, plowed and dry-farmed. The project area has been dry-farmed in at least two of the past six years. These agricultural activities have significantly affected both the upland and wetland plant communities.

The dominant plant community within the project area is ruderal non-native annual grassland. Dominant species comprising the non-native annual grassland include a variety of naturalized Mediterranean grasses including soft chess (*Bromus hordeaceus*), ripgut brome (*B. diandrus*), medusa head (*Taeniatherum caput-medusae*), wild oats (*Avena fatua*). Common herbaceous species include filarees (*Erodium spp*.), yellow star-thistle (*Centaurea solstitialis*), rose clover (*Trifolium hirtum*), cut-leaf geranium (*Geranium dissectum*), tarweed (*Holocarpha virgata*), Fitch's spikeweed (*Hemizonia fitchii*), common vetch (*Vicia sativa*), and hairy hawkbit (*Leontodon taraxacoides*).

The surface runoff within the project area flows to the north and west with the majority of the site draining to the north. The surface

runoff on the eastern three-quarters of the project area flows through a series of swales to the north. At the northern border of the study area, these swales flow into culverts that are part of the West Roseville Specific Plan developments storm drainage system. The surface runoff on the western one-quarter of the property flows through a series of swales and an intermittent stream to the west. West of the project area, surface flow drains through agricultural ditches in lands managed for rice cultivation, eventually flowing into Curry Creek.

The soil mapping units within the project area include: Cometa-Fiddyment Complex 1-5% slopes; Fiddyment-Kaseberg loams 2-9% slopes; and, San Joaquin-Cometa sandy loams 1-5% slopes. These soils occur on low terraces, are shallow to moderately deep, and underlain by hardpans except for Cometa which is underlain by a dense clay pan. The average depth to hard pan or clay pan in these soils ranges from 18" to 40". As stated previously, the project area has been historically and recently disked, plowed and dry-farmed. As a result, the soils are not compacted and are well-aerated. The disking and/or plowing has eliminated much of the natural micro-topography in many areas.

Aquatic Resources

A jurisdictional delineation of the project area was originally completed by ECORP Consulting, Inc. in 2006 and verified by the Corps of Engineers in November 2006. That verification expired November 8, 2011 and the Applicant has requested re-verification of the delineation from the Corps. Sheet 2 of 5 of the application drawings (Appendix A) is a copy of the delineation map. There is a total of 12.5470 acres of waters of the U.S. existing within the project area. This total is comprised 0.9462 acre of intermittent streams, 1.3498 acres of seasonal wetlands, 8.4368 acres of wetland swales and 1.8142 acres of vernal pools.

Two intermittent streams flow through the extreme northwest corner of the project area and converge near the western boundary

of the project area. Streams are differentiated from linear wetlands (e.g. wetland swales) by the presence of defined beds and banks and an identifiable ordinary high water line. Intermittent streams flow seasonally, but for a longer duration than ephemeral streams. Intermittent streams receive baseflow input from a seasonal perched groundwater table and, as a result, experience flow for weeks or months after rainfall events.

The seasonal wetlands are depressional wetlands that are inundated in the winter and early spring but are dry throughout the summer and fall. Depths of these seasonal wetlands range from a few inches up to 2 feet. These depressional seasonal wetlands are topographically and hydrologically similar to vernal pools (described below) but their plant communities are not dominated by species considered endemic to vernal pools. Common plant species include perennial rye (*Lolium perenne*), Mediterranean barley (*Hordeum marinum*), rabbit's-foot grass (*Polypogon monspeliensis*), mannagrass (*Glyceria declinata*), hyssop loosestrife (*Lythrum hyssopifolia*), toad rush (*Juncus bufonius*), and slender popcorn flower (*Plagiobothrys stipitatus micranthus*). These seasonal wetlands are essentially vernal pools that have been disturbed to the extent that they no longer support a vernal pool plant community.

Wetland swales are linear sloping seasonal wetlands that occur in topographic swales versus seasonal wetlands which occur in depressions. They are inundated in the winter and early spring during and for up to several weeks following rainfall events. They often have embedded depressions that pond water to a duration similar to depressional seasonal wetlands and vernal pools. The most common plants occurring within the wetland swales include perennial rye, Mediterranean barley, rabbit's-foot grass, and hyssop loosestrife.

Vernal pools are seasonally inundated wetlands occurring within topographic depression which occur both as isolated features in the landscape and in associated wetland and non-wetland swales. They typically flood to depths ranging from 2 inches to over 1 foot in the

winter and early spring. The plant communities within vernal pools are typically dominated by vernal pool endemics, a majority of which are native annuals. These vernal pool endemics include slender popcorn flower, Vasey's coyote thistle, Carters buttercup (*Ranunculus alveolatus*), double-horned downingia (*Downingia bicornuta*), and annual hairgrass (*Deschampsia danthonioides*). Depending on their depth and level of disturbance, other non-native species common to seasonal wetlands may also be present as dominants or associates.

Impacts

In calculating direct effects, it was assumed that if any portion of a non-linear, depressional wetland (i.e. seasonal wetlands and vernal pools) would be direct affected, all of it would be directly affected. For linear, sloping wetlands (i.e. wetland swales) the direct effects was calculated as that portion of the wetland within the footprint of development. Sheet 4 of 5 of the application drawings is an impact map depicting the impacts to waters of the U.S. and listing the acreages of these impacts.

For purposes of calculating impacts it was assumed that adjacent properties currently under application for a DA Permit (Conley and Federico properties) are not permitted and constructed at the time that the Westbrook project is constructed. Under this scenario, there would be fill slopes extending south onto both of these properties.

The Project would result in a total of 9.6007 acres of direct impacts to waters of the U.S. These direct impacts are comprised of 0.8727 acre of vernal pools, 0.6244 acre of seasonal wetlands and 8.1035 acres of wetland swales. Of these direct impacts, approximately 0.0367 acre is located off-site on the Federico Westpark and Conley properties. If one or both of these properties are permitted and constructed prior to Westbrook, the impacts attributable to Westbrook would be reduced accordingly.

Chapter 4
Proposed Mitigation Measures

Goals and Objectives

The overall objective of this mitigation plan is to compensate for the loss of wetlands and other waters of the U.S. The proposed mitigation measures are intended to replace both loss of wetland area and wetland function.

This plan is also intended to mitigate for potential impacts to federally-listed threatened and endangered species that have been documented as occurring within the project area or are considered likely to occur within the project area. As stated previously, a separate Biological Assessment has been prepared to more specifically address impacts to federally-listed species and to discuss the proposed mitigation measures relative to those species.

Description of Proposed Mitigation Measures

The Applicant proposes to compensate for impacts to waters of the U.S. through a combination of preservation of wetlands on-site, purchase of vernal pool, riparian and emergent marsh complex, and/or seasonal wetland restoration/creation credits from approved mitigation banks and purchase of vernal pool preservation credits from an approved mitigation bank.

The Applicant proposes establishment of 35.8-acre wetland preserve in the northwest corner of the project area. This wetland

preserve is contiguous with much larger wetland preserves located to the north and east on the West Roseville Specific Plan development. Approximately 2.983 acres of wetlands will be preserved and managed. This total is comprised of .946 acres of intermittent channel, 0.952 acres of vernal pools, 0.725 acres of seasonal wetlands and 0.359 acres of wetland swales.

The Applicant further proposes to provide 22.62 acres of vernal pool preservation credits, 0.873 acre of vernal pool restoration credits and up to 16.831 acres of riparian and freshwater marsh complex and/or seasonal wetland creation credits from an approved mitigation bank.

On-site Preservation

The wetland preserve was sited at its proposed location because it would be situated adjacent to and contiguous with designated open space on the north and along a portion of its eastern boundary. It would be bordered by agricultural lands along its western boundary and developed lands to the south.

As stated previously, virtually all the project area has been disked and/or plowed in the past for agriculture. This has resulted in the general degradation of wetland function throughout the project area. The degradation is evident in terms of the muted micro-topography, aerated surface soils and ruderal plant communities. If the project area is not developed and wetlands not preserved and managed, it is very likely that this degradation would continue to occur in the future. Therefore, the preservation and management of the wetlands within the proposed wetland preserve would eliminate this on-going degradation and restore (rehabilitate) wetland function in the preserved waters and wetlands.

Figure 1 is a map of the on-site wetland preserve.

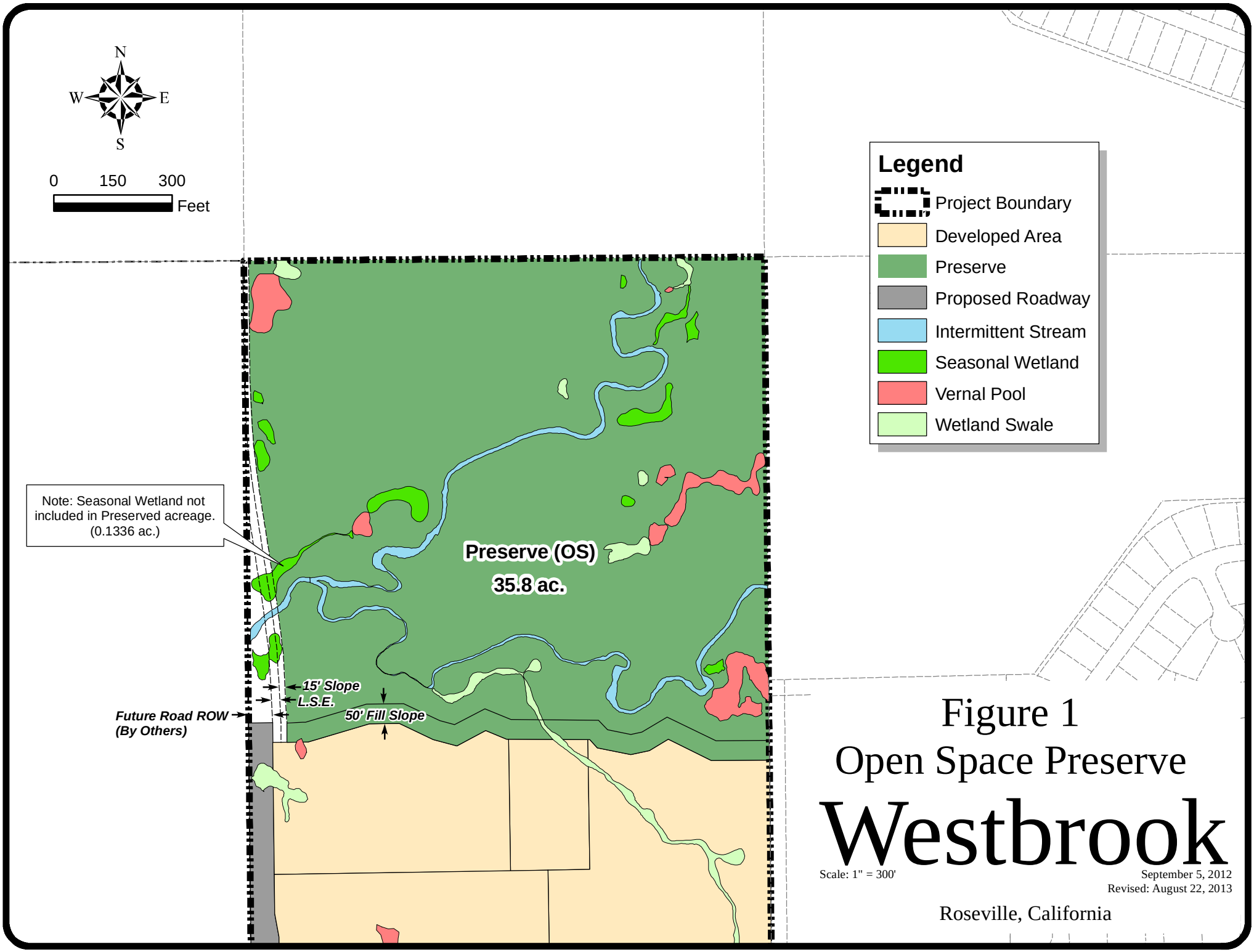


Figure 1
Open Space Preserve
Westbrook

Scale: 1" = 300'

September 5, 2012
Revised: August 22, 2013

Roseville, California

Off-site Creation/Restoration

The Applicant proposes to mitigate the 0.873 acre of direct impacts to vernal pools by purchasing 0.873 acre of constructed vernal pool restoration credits from the Toad Hill Mitigation Bank, a 1:1 mitigation ratio. The Applicant proposes to mitigate 0.624 acre of direct impacts to seasonal wetlands either by purchasing constructed riparian and freshwater marsh complex creation credits from the Sacramento River Ranch Wetlands Mitigation Bank at a 1:1 ratio and/or by purchasing constructed seasonal wetland mitigation credits from the Toad Hill Wetlands Mitigation Bank at a 1:1 ratio. The Applicant proposes to mitigate 8.104 acres of direct impacts to wetland swales either by purchasing constructed riparian and freshwater marsh complex creation credits from the Sacramento River Ranch Wetlands Mitigation Bank at a 2:1 ratio and/or by purchasing constructed seasonal wetland mitigation credits from the Toad Hill Wetlands Mitigation Bank at a 1:1 ratio. The Toad Hill Mitigation Bank is located within the Western Placer County Core Vernal Pool Recovery Area. The purchase of constructed seasonal wetland credits from the Toad Hill Mitigation Bank is preferred over purchase of constructed riparian and freshwater marsh complex credits from the Sacramento River Ranch Wetlands Mitigation Bank. The number of credits ultimately purchased from either bank will depend on the number of credits available at the Toad Hill Mitigation Bank at the time the mitigation must be implemented.

Off-site Preservation

The Applicant proposes to secure 22.62 acres of vernal pool preservation credits from an approved conservation bank within the bank's approved Service area. The credits would be obtained from the Laguna Terrace Conservation Bank.

Implementation

Implementation Schedule

The Applicant proposes to implement the purchase of wetland restoration and/or creation credits in a phased manner corresponding to the phased implementation of the Project. Prior to beginning grading activities on any phase of the Project, the Applicant will purchase the corresponding mitigation credits needed to mitigate the impacts that would result from that phase of grading.

The mitigation credits will be secured and proof of purchase will be provided to the Corps prior to initiating construction activities.

Responsibilities for Implementing Plan

The permittee will be responsible for securing the off-site preservation and creation credits in the amounts commensurate to the impacts associated with each respective permit.

Chapter 5
Long-term Maintenance and Management

Prior to initiation of construction activities in wetlands and other waters of the U.S., a conservation easement will be established over the open space preserve, excluding the 50-foot wide fill slope. The conservation easement will be granted to the City of Roseville who will be responsible for the long term maintenance of the preserve. The long-term management of the preserve will be carried out under the City of Roseville's Open Space Preserve Overarching Management Plan (City of Roseville 2009) which has been previously approved by the Corps of Engineers and U.S. Fish and Wildlife Service. The conservation easement will limit activities within the open space preserves to those activities that are beneficial to the preservation of wetlands and their surrounding upland habitats and as specifically allowed for in the Final Mitigation Plan and the City of Roseville's Open Space Preserve Overarching Management Plan. Following completion of grading, a conservation easement over the 50-foot fill slope will be granted to the City of Roseville to for the long-term maintenance under the over-arching management plan. A funding mechanism, specifically, a maintenance CFD as required by the City of Roseville, will be established to provide for the long-term maintenance of the preserve in perpetuity.

Chapter 6
References

City of Roseville. 2009. City of Roseville Open Space Preserve Overarching Management Plan, Administrative Draft. March 10, 2010. Roseville, CA.

Corps of Engineers and Environmental Protection Agency. 2008. Compensatory Mitigation for Losses of Aquatic Resources, Final Rule. FR Vol. 73, No. 70. April 10, 2008.

Corps of Engineers. 2008. Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0). ERCE/EL TR-08-28. September 2008. Vicksburg, MS.

Corps of Engineers. 2004. Habitat Mitigation and Monitoring Proposal Guidelines. Sacramento and San Francisco Districts Public Notice dated December 30, 2004. Sacramento, CA.

Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual, Technical Report Y-87-1. US Engineer Waterways Experiment Station. Vicksburg, MS.

North Fork Associates. 2009. Biological Assessment for the Sierra Vista Specific Plan Project, Placer County, California. Revised June 9, 2009. Prepared for URS Corporation. San Francisco, CA.

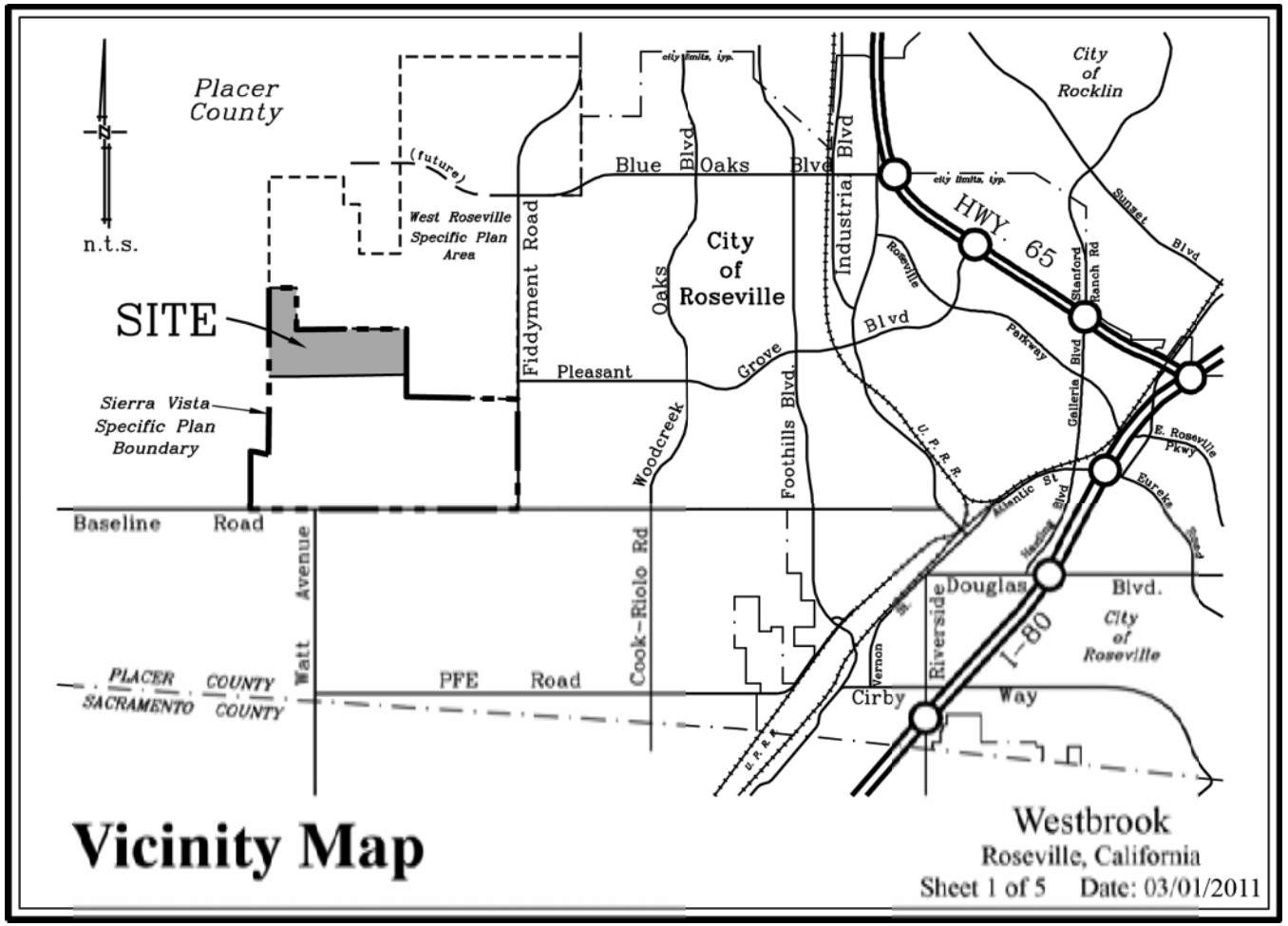
Reed, P.B. 1988. National List of Plant Species that Occur in Wetlands: California (Region 0). Biological Report 88(26.10). May 1988. National Ecology Research Center, National Wetlands Inventory, U.S. Fish and Wildlife Service. St. Petersburg, FL.

U.S.D.A., Soil Conservation Service. 1980. Soil Survey of Placer County, Western Part. Sacramento, CA.

APPENDIX A

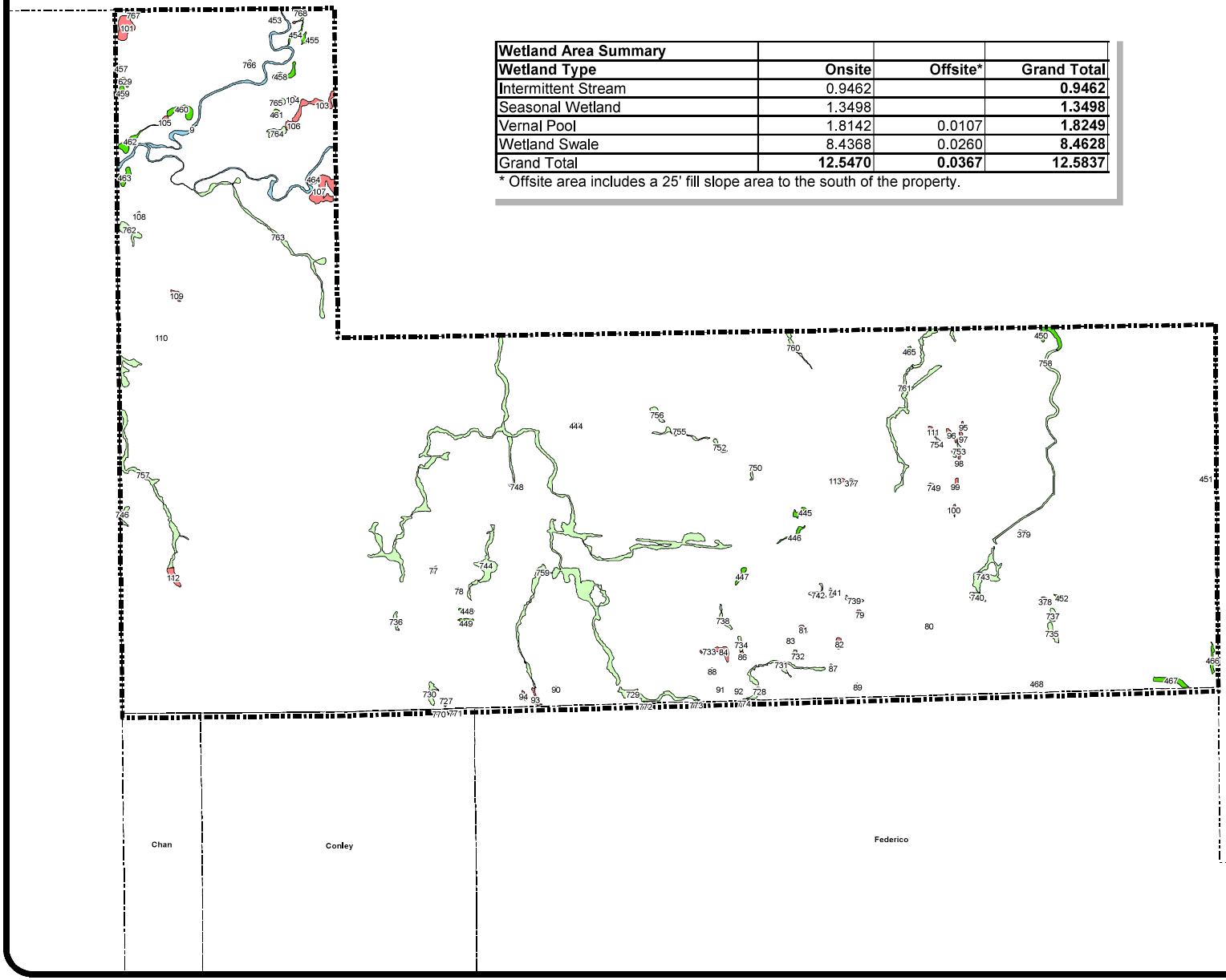
APPLICATION DRAWINGS

Gibson & Skordal, LLC
WETLAND CONSULTANTS


Placer County
n.t.s.
SITE
Sierra Vista Specific Plan Boundary
West Roseville Specific Plan Area
(future)
Fiddyment Road
Blue Oaks Blvd
Oaks Blvd
City of Roseville
Industrial Blvd
City of Rocklin
HWY. 65
Roseville Blvd
Stanford Ranch Rd
Sunset Blvd
Parkway Blvd
Galleria Blvd
E. Roseville Pkwy
Eureka Road
Pleasant Grove
Woodcreek
Foothills Blvd.
U.P.R.R.
Atlantic St
Harding Blvd
Douglas Blvd.
City of Roseville
Riverside
Vernon St
I-80
Cirby Way
Baseline Road
Watt Avenue
Cook-Riolo Rd
PFE Road
PLACER COUNTY
SACRAMENTO COUNTY
Vicinity Map
Westbrook
Roseville, California
Sheet 1 of 5 Date: 03/01/2011

Wetland Area Summary			
Wetland Type	**Onsite**	**Offsite***	**Grand Total**
Intermittent Stream	0.9462		**0.9462**
Seasonal Wetland	1.3498		**1.3498**
Vernal Pool	1.8142	0.0107	**1.8249**
Wetland Swale	8.4368	0.0260	**8.4628**
Grand Total	**12.5470**	**0.0367**	**12.5837**

* Offsite area includes a 25' fill slope area to the south of the property.



Legend

- Project Boundary
- Ownership Line
- Intermittent Stream
- Seasonal Wetland
- Vernal Pool
- Wetland Swale

N
W E
S

0 300 600 1,200
Feet

Existing Aquatic Resources

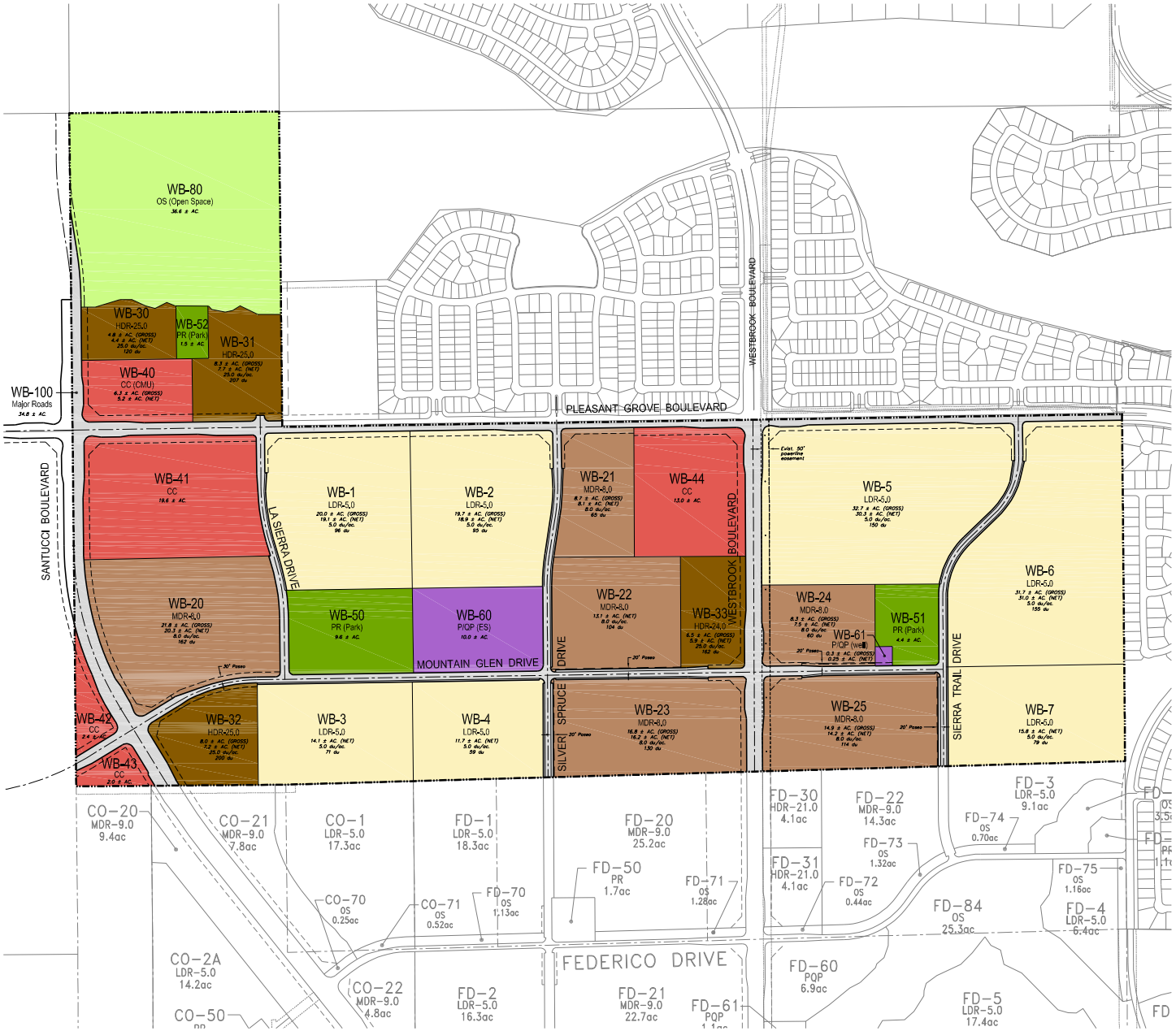
Westbrook

Scale: 1" = 600'

Roseville, California

February 25, 2014

Sheet 2 of 5



PRELIMINARY STREET GEOMETRY, ACREAGE, and DWELLING UNIT COUNTS

WESTBROOK

Land Use	Acres (gr.)	Acres (net)	D.U.
LDR	145.7	140.9	705 (1)
MDR	83.6	79.4	635 (2)
HDR	27.6	25.2	689 (3)
CC	37.0		
CC(CMU)	6.3		
P/QP (School)	10.0		
P/QP (well site)	0.3		
PARK	15.5		
OPEN SPACE	36.6		
MAJOR ROADS	34.8		
SITE TOTALS	397.4		2029

NOTES:
(1) LDR Dwelling Units based on net acres @ 5.0 du/ac.
(2) MDR Dwelling Units based on net acres @ 8.0 du/ac.
(3) HDR Dwelling Units based on gross acres @ 25.0 du/ac.

SIERRA VISTA LOT NUMBER KEY

LOT NUMBERS	LAND USE
1 - 19	Low Density Residential (LDR)
20 - 29	Medium Density Residential (MDR)
30 - 39	High Density Residential (HDR)
40 - 49	CC/CMU/BP
50 - 59	Park (PR)
60 - 69	Public / Quasi-Public (PQP)
70 - 79	Open Space (OS) - Paseos
80 - 89	Open Space (OS)
90 - 99	Urban Reserve (UR)
100	Major Roads

NORTH
0 300 600
SCALE: 1" = 300'

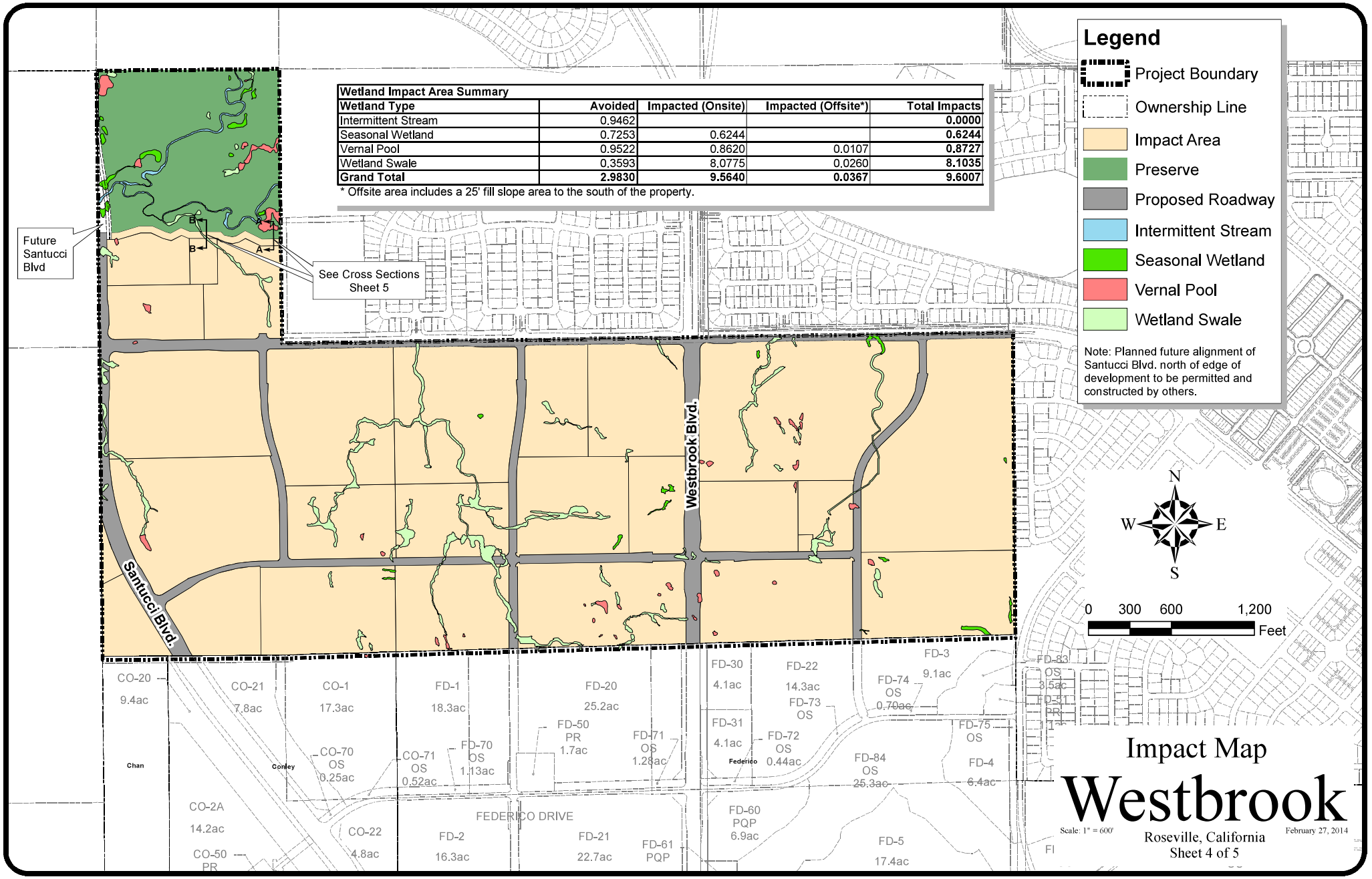
PROPOSED PROJECT LAND PLAN

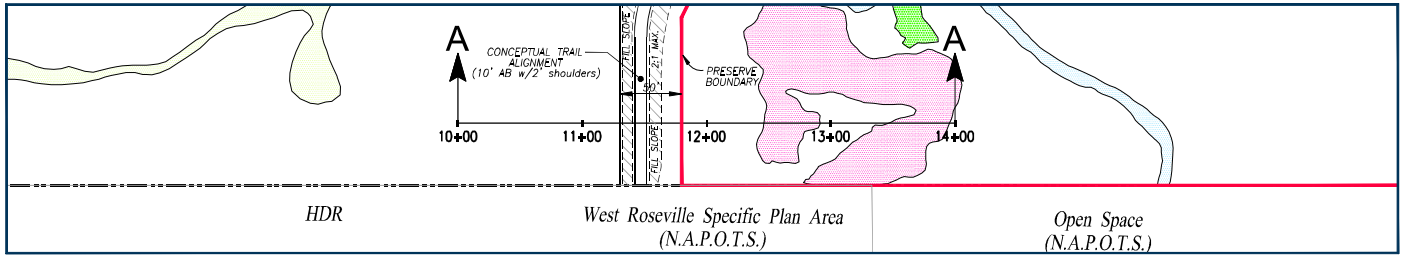
Westbrook

Westpark Associates
Not to Scale

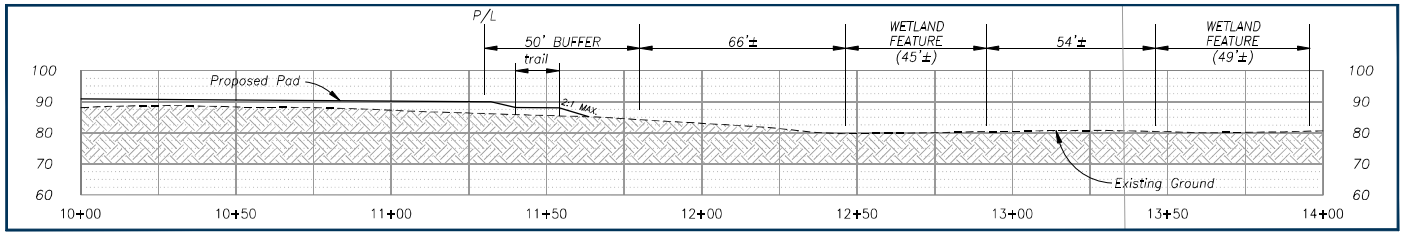
MacKay & Somps Civil Engineers, Inc.
Roseville, California
March 1, 2011
Sheet 3 of 5

MACKAY & SOMPS
ENGINEERS PLANNERS SURVEYORS

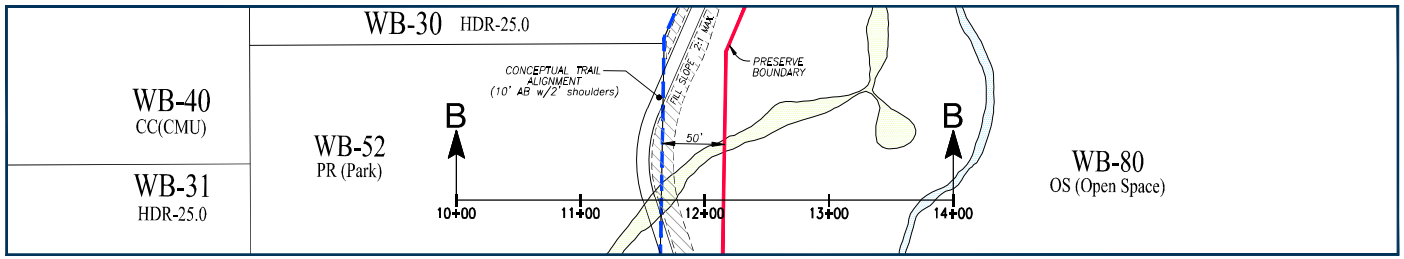

Legend
Project Boundary
Ownership Line
Impact Area
Preserve
Proposed Roadway
Intermittent Stream
Seasonal Wetland
Vernal Pool
Wetland Swale
Note: Planned future alignment of Santucci Blvd. north of edge of development to be permitted and constructed by others.
Wetland Impact Area Summary
Wetland Type | Avoided | Impacted (Onsite) | Impacted (Offsite*) | Total Impacts
Intermittent Stream | 0.9462 | | | 0.0000
Seasonal Wetland | 0.7253 | 0.6244 | | 0.6244
Vernal Pool | 0.9522 | 0.8620 | 0.0107 | 0.8727
Wetland Swale | 0.3593 | 8.0775 | 0.0260 | 8.1035
Grand Total | 2.9830 | 9.5640 | 0.0367 | 9.6007
* Offsite area includes a 25' fill slope area to the south of the property.
Future Santucci Blvd
See Cross Sections Sheet 5
Santucci Blvd.
Westbrook Blvd.
FEDERICO DRIVE
N
W
E
S
0 300 600 1,200
Feet
Impact Map
Westbrook
Scale: 1" = 600'
Roseville, California
Sheet 4 of 5
February 27, 2014



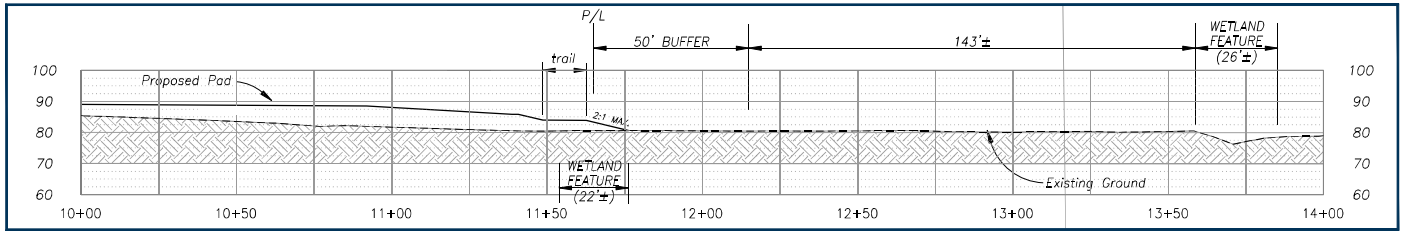
Plan View
1"=100'



Section A-A
1"=40'



Plan View
1"=100'



Section B-B
1"=40'

Figure 5

TYPICAL CROSS-SECTIONS

Westbrook Property

Scale: As Noted — *Roseville, California* — June 3, 2011

APPENDIX B

Revised 3.3 Policies Related to GHG Emissions and Climate Change

City of Roseville Greenhouse Gas Policies

- **Community Form Policy 5:** Promote land use patterns that result in the efficient use of urban lands and preservation of open space as specified in the Open Space and Conservation Element.
- **Community Form - Relationship to Transit, Pedestrian, and Air Quality - Policy 1:** Promote land use patterns that support a variety of transportation modes and accommodate pedestrian mobility.
- **Community Form - Relationship to Transit, Pedestrian, and Air Quality - Policy 2:** Allow for land use patterns and mixed use development that integrate residential and non-residential land uses, such that residents may easily walk or bike to shopping, services, employment, and leisure activities.
- **Community Form - Relationship to Transit, Pedestrian, and Air Quality - Policy 3:** Concentrate higher intensity uses and appropriate support uses within close proximity of transit and bikeway corridors as identified in the Bicycle Master Plan. In addition, some component of public use such as parks, plazas, public buildings, community centers and/or libraries should be located within the corridors.
- **Community Form - Relationship to Transit, Pedestrian, and Air Quality - Policy 4:** Promote and encourage the location of employee services such as childcare, restaurants, banking facilities, convenience markets, etc., within major employment centers for the purpose of reducing midday service-related vehicle trips.
- **Community Form - Relationship to Transit, Pedestrian, and Air Quality - Policy 5:** Where feasible, improve existing development areas to create better pedestrian and transit accessibility.
- **Community Form - Relationship to Transit, Pedestrian, and Air Quality - Policy 6:** Through City land use planning and development approvals, require that neighborhood serving uses (e.g., neighborhood commercial uses, day care, parks, schools, and other community facilities) be physically linked with adjacent residential neighborhoods.
- **Community Form - Relationship of New Development - Policy 1:** Require that new development areas and associated community-wide facilities (open space resources, parks, libraries, etc.) be linked and oriented to existing developed areas of the community through road networks, public transit systems, open space systems, bike way and pedestrian systems, and other physical connections.
- **Community Form – Jobs/Housing and Economic Development - Policy 1:** Strive for a land use mix and pattern of development that provides linkages between jobs and employment uses, will provide a reasonable jobs/housing balance, and will maintain the fiscal viability of the City.
- **Community Form – Community Design - Policy 2:** Continue to develop and apply design standards that result in efficient site and building designs, pedestrian friendly projects that stimulate the use of alternative modes of transportation, and the establishment of a functional relationship between adjacent developments.
- **Community Form – Community Design - Policy 3:** Encourage project designs that place a high priority and value on open space, and the preservation, enhancement and incorporation of natural resources and other features including consideration of topography, vegetation, wetlands, and water courses.
- **Community Form – Community Design - Policy 9:** The location and preservation of native oak trees and oak woodlands shall be a primary factor in determining site design, building location, grading,

construction and landscaping, and in establishing the character of projects through their use as a unifying element in both new an existing development.

- **Growth Management Policy 8:** Manage growth in such a way to ensure that significant open space areas will be preserved.
- **Circulation – Level of Service - Policy 2:** Strive to meet the level of service standards through a balanced transportation system that reduces the auto emissions that contribute to climate change by providing alternatives to the automobile and avoiding excessive vehicle congestion through roadway improvements, Intelligent Transportation Systems, and transit improvements.
- **Circulation – Level of Service – Policy 5:** Enable the City to designate a Pedestrian District over a geographic area for the purpose of implementing measures that promote pedestrian walkability and reduce total vehicle miles traveled and resultant air pollution emissions that contribute to climate change. In these districts, the City recognizes that pedestrian travel takes a higher priority than automobile travel, which could reduce the vehicular level of service.
- **Circulation – Transit - Policy 1:** Pursue and support transit services within the community and region and pursue land use, design and other mechanisms that promote the use of such services.
- **Circulation – Transportation System Management - Policy 1:** Continue to enforce the City's TSM ordinance and monitor its effectiveness.
- **Circulation – Transportation System Management – Policy 2:** Work with appropriate agencies to develop measures to reduce vehicular travel demand and total vehicle miles traveled and meet air quality goals.
- **Circulation – Bikeway/Trails – Policy 1:** Develop a comprehensive and safe system of recreational and commuter bicycle routes and trails that provides connections between the City's major employment and housing areas and between its existing and planned bikeways.
- **Circulation – Bikeway/Trails – Policy 2: C**oordinate Roseville's bikeway and trail system with those of neighboring jurisdictions to provide both local and regional connections.
- **Air Quality and Climate Change Policy 1:** Cooperate with other agencies to develop a consistent and effective approach to air pollution planning.
- **Air Quality and Climate Change Policy 4:** As part of the development review process, develop mitigation measures to minimize stationary and area source emissions.
- **Air Quality and Climate Change – Transportation and Circulation - Policy 5:** Develop transportation systems that minimize vehicle delay and air pollution.
- **Air Quality and Climate Change – Transportation and Circulation – Policy 6:** Develop consistent and accurate procedures for mitigating transportation emissions from new and existing projects.
- **Air Quality and Climate Change – Transportation and Circulation – Policy 7:** Encourage alternative modes of transportation including pedestrian, bicycle, and transit usage.
- **Air Quality and Climate Change – Land Use – Policy 9:** Encourage land use policies that maintain and improve air quality.
- **Air Quality and Climate Change – Energy Conservation – Policy 10:** Conserve energy and reduce air emissions by encouraging energy efficient building designs and transportation systems.

- **Open Space and Conservation – Open Space System – Policy 1:** Provide an interconnecting system of open space corridors that, where feasible, incorporate bikeways and pedestrian paths.
- **Open Space and Conservation – Open Space System – Policy 2:** Provide interconnected open space corridors between open space and habitat resources, recreation areas, schools, employment, commercial service and residential areas.
- **Open Space and Conservation – Open Space System – Policy 3:** Work with adjacent jurisdictions to connect the City with regional open space and trail systems, providing a network of open space and habitat resources, pathways and, where reasonable, equestrian trails through the City to link nearby communities
- **Open Space and Conservation – Open Space System – Policy 4:** Require all new development to provide linkages to existing and planned open space systems. Where such access cannot be provided through the creation of open space connections, identify alternative linkages.
- **Open Space and Conservation – Open Space System – Policy 6:** Take into account consideration of natural habitat areas in developing linkages and in preserving open space areas. Identify alternate sites for linkages where sensitive habitat areas have the potential to be adversely impacted.
- **Open Space and Conservation – Open Space System – Policy 7:** Maximize opportunities for preservation and maintenance of open space resources, including establishment of private open space areas. Consider coordination with non-profit organizations and investigate the potential for conservancy ownership and/or management of open space areas.
- **Open Space and Conservation – Vegetation and Wildlife – Policy 1:** Incorporate existing trees into development projects, and where preservation is not feasible, continue to require mitigation for the loss of removed trees. Particular emphasis shall be placed on avoiding the removal of groupings or groves of trees.
- **Open Space and Conservation – Vegetation and Wildlife – Policy 2:** Preserve and rehabilitate continuous riparian corridors and adjacent habitat along the City's creeks and waterways.
- **Open Space and Conservation – Vegetation and Wildlife – Policy 3:** Require dedication of the 100-year flood plain or comparable mechanism to protect habitat and wildlife values in perpetuity.
- **Open Space and Conservation – Vegetation and Wildlife – Policy 4:** Require preservation of contiguous areas in excess of the 100-year flood plain as merited by special resources or circumstances. Special circumstances may include, but are not limited to, sensitive wildlife or vegetation, wetland habitat, oak woodland areas, grassland connections in association with other habitat areas, slope or topographical considerations, recreation opportunities, and maintenance access requirements.
- **Open Space and Conservation – Groundwater Recharge and Water Quality – Policy 3:** Ensure a buffer area between waterways and urban development to protect water quality and riparian areas.
- **Open Space and Conservation – Groundwater Recharge and Water Quality – Policy 4:** Consider the use of City property for habitat preservation and mitigation requirements resulting from development proposals when such efforts do not conflict with existing resources, recreational opportunities, or other City goals, policies, or programs.
- **Open Space and Conservation – Groundwater Recharge and Water Quality – Policy 5:** Continue to monitor groundwater resources and investigate strategies for enhanced sustainable use. Areas where recharge potential is determined to be high shall be considered for designation as open space.

- **Open Space and Conservation – Groundwater Recharge and Water Quality – Policy 6:** Where feasible, locate storm water retention ponds in areas where subsoil is suitable for groundwater recharge.
- **Parks and Recreation Policy 1:** The City shall ensure the provision of 9 acres of park land per 1,000 residents
- **Parks and Recreation Policy 6:** Take into consideration energy efficiency and water conservation, including the use of treated wastewater, in park development, and design
- **Public Facilities – Electric Utilities – Policy 5:** Explore the feasibility of the development of and participation in renewable energy resources.
- **Public Facilities – Electric Utilities – Policy 6:** Adopt a load/resource management plan, incorporating energy efficiency, conservation, load management, and reliability strategies, identifying program objectives and implementation and monitoring mechanisms.
- **Public Facilities – Electric Utilities – Policy 8:** Pursue reasonable and cost-effective energy efficiency, conservation, and load management programs pertinent to the electric utility system.
- **Public Facilities – Electric Utilities – Policy 10:** Require new development to pay a fair share of the cost of new sub-transmission and distribution needed to serve the development and to dedicate sites and easements needed for substations, transmission, sub-transmission, and distribution.
- **Public Facilities – Water System – Policy 10:** Develop and implement water conservation standards and measures as necessary elements of the water system.
- **Public Facilities – Water System – Policy 11:** Develop and implement an aquifer storage and recovery program.
- **Public Facilities – Wastewater and Recycled Water System – Policy 5:** Explore potential alternatives to treatment and discharge.
- **Public Facilities – Wastewater and Recycled Water System – Policy 6:** Develop, plan, and provide incentives for use of recycled water by the public and private sectors.
- **Public Facilities – Solid Waste, Source Reduction and Recycling – Policy 1:** Ensure existing and future recycling sites and operations remain viable through application of land use compatibility standards.
- **Public Facilities – Solid Waste, Source Reduction and Recycling – Policy 2:** Comply with the source reduction and recycling standards mandated by the State by reducing the projected quantity of solid waste disposed at the regional landfill by 50%, as well as any mandated future reductions.
- **Public Facilities – Solid Waste, Source Reduction and Recycling – Policy 5:** Develop public education and recycling programs
- **Public Facilities – Water and Energy Conservation – Policy 1:** Develop and implement water conservation standards.
- **Public Facilities – Water and Energy Conservation – Policy 2:** Implement various water conservation plans developed by the Environmental Utilities Department.
- **Public Facilities – Water and Energy Conservation – Policy 3:** Explore potential uses of treated wastewater.

- **Public Facilities – Water and Energy Conservation – Policy 4:** Protect the quality and quantity of the City's groundwater and consider designating areas as open space where recharge potential is high.
- **Public Facilities – Water and Energy Conservation – Policy 5:** Develop and adopt a landscape ordinance that provides standards for the use of drought tolerant, xeriscape, and water-conserving landscape practices for both public and private projects.
- **Public Facilities – Water and Energy Conservation – Policy 6:** Develop and implement public education programs designed to increase public participation in energy, water conservation and recycled water use.
- **Public Facilities – Water and Energy Conservation – Policy 7:** Require large electricity users to submit a use and conservation plan concurrent with development review specifying measures to be taken to minimize demand.
- **Public Facilities – Water and Energy Conservation – Policy 8:** Enforce energy requirements and encourage development and construction standards that promote energy efficiency and conservation.
- **Public Facilities – Water and Energy Conservation – Policy 9:** Preserve scarce resources by undertaking major projects in energy conservation and load management, including increasing efficiency in the City's electrical system.
- **Public Facilities – Water and Energy Conservation – Policy 10:** Continue and expand energy efficiency and conservation programs to serve all utility users.
- **Safety – Flood Protection – Policy 1:** Continue to regulate, through land use, zoning, and other restrictions, all uses and development in areas subject to potential flooding.
- **Safety – Flood Protection – Policy 2:** Monitor and regularly update City flood studies, modeling and associated land use, zoning, and other development regulations.
- **Safety – Flood Protection – Policy 3:** Continue to pursue a regional approach to flood issues.
- **Safety – Flood Protection – Policy 4:** Provide flood warning and forecasting information to community residents to reduce impacts to personal property.
- **Safety – Flood Protection – Policy 5:** Minimize the potential for flood damage to public and emergency facilities, utilities, roadways, and other infrastructure.
- **Safety – Flood Protection – Policy 6:** Require new developments to provide mitigation to insure that the cumulative rate of peak run-off is maintained at pre-development levels.
- **Safety – Flood Protection – Policy 8:** Establish flood control assessment districts or consider other funding mechanisms to mitigate flooding impacts.
- **Safety – Flood Protection – Policy 9:** Where feasible, maintain natural stream courses and adjacent habitat and combine flood control, recreation, water quality, and open space functions.