

# **Appendix A**

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Notice of Preparation and  
NOP Comments



## DEVELOPMENT SERVICES – PLANNING

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311 Vernon Street, Roseville, CA 95678 (916) 774-5276

### NOTICE OF PREPARATION

**Date:** June 6, 2025

**To:** State Clearinghouse  
Responsible Agencies  
Trustee Agencies  
Interested Parties

**Subject:** Notice of Preparation of an Environmental Impact Report for the proposed Phillip Road Site Project and Notice of Public Scoping Meeting

**Project Title/File Number:** INFILL PCL 373 – Phillip Road Site, File #PL24-1010

**NOP Comment Period:** Written comments are due to the City’s Development Services – Planning Department no later than 5:00 p.m. on July 7, 2025.

**Public Scoping Meeting:** In accordance with Public Resources Code Section 21083.9, notice is hereby given that the City of Roseville will conduct a public scoping meeting on June 24, 2025 at 6:30 p.m. at the Martha Riley Library (1501 Pleasant Grove Boulevard, Roseville).

**Project Location:** The project would be located at 6382 Phillip Road on approximately 241 acres of largely undeveloped/grazing land in the northwest corner of Roseville, in Placer County. The project site’s Assessor’s Parcel Number (APN) is 017-101-008-000.

**Lead Agency and Contact Person:** City of Roseville Development Services – Planning  
Shelby Maples, Associate Planner  
311 Vernon Street  
Roseville, CA 95678  
Phone: (916) 746-1347  
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# 1 INTRODUCTION

This Notice of Preparation (NOP) has been issued to notify interested parties that an environmental impact report (EIR) will be prepared, and to solicit feedback on the scope and content of the analysis in the EIR. The City of Roseville will be the lead agency and will prepare an EIR for the Phillip Road Project, which includes the project approvals listed in Section 4 of this NOP. The project description and vicinity and location maps are provided in this NOP.

A previously proposed project, known as the Roseville Industrial Park, was proposed on the same project site and included the proposed development of a range of industrial uses, including light manufacturing, warehousing, and distribution uses. The City issued an NOP for the Roseville Industrial Park in July 2021, conducted a public scoping meeting, and received public comments on the scope of the EIR. In January 2023, the City published a Draft EIR (State Clearinghouse [SCH] # 2021070186) and received public comments from reviewing agencies and the public. Subsequently, the applicant held a series of public workshops in 2023 and 2024. The Roseville Industrial Park Project was formally withdrawn by the applicant in September 2024.

An application for a new project, the Phillip Road Project, was received by the City in October 2024. The Phillip Road Project is a mixed-use project with residential, medical offices, retail, and innovation uses. The City has determined that, pursuant to CEQA, an EIR is required to evaluate the project's potential environmental impacts and has initiated the CEQA process by releasing this NOP.

**NOP Comment Period:** Due to the time limits mandated by state law, your response to this NOP must be sent at the earliest possible date and submitted to the City, but not later than 30 calendar days after June 6, 2025 (the date this notice was first posted). Please submit comments to the City of Roseville no later than 5 p.m. on July 7, 2025. Please provide written comments to:

City of Roseville Development Services – Planning  
Shelby Maples, Associate Planner  
311 Vernon Street  
Roseville, CA 95678  
Phone: (916) 746-1347  
Fax: (916) 774-5129  
Email: [smaples@roseville.ca.us](mailto:smaples@roseville.ca.us)

**Public Scoping Meeting:** A public scoping meeting will be held on June 24, 2025 to receive comments from interested parties regarding the issues that should be addressed in the EIR. The time and location of the public scoping meeting is provided on the first page of this NOP.

## 2 REGULATORY BACKGROUND

This NOP provides notification that an EIR will be prepared for the project, and has been prepared in accordance with the California Environmental Quality Act (CEQA), Public Resources Code Division 13 Section 21000 et seq., and the State CEQA Guidelines, Title 14 California Code of Regulations Section 15000 et seq. According to the State CEQA Guidelines Section 15064, an EIR must be prepared if there is substantial evidence in light of the whole record that the proposed project may have a significant effect on the environment.

### 3 PROJECT DESCRIPTION

Panattoni Development Company (Panattoni or project applicant) proposes to purchase and develop a property in the City of Roseville with an approximately 176-acre mixed-use development. Proposed uses include approximately 664 residential units, 30,084 square feet (sf) of retail, 20,925 sf of medical offices, and 1,062,041 sf of innovation center uses, as well as parks, open space, and trails. The residential uses would be separated from the other proposed uses by a new north-south public roadway, which would connect to the north by a bridge across Pleasant Grove Creek and Pleasant Grove Creek Bypass Channel. The project also includes utility extensions and improvements to Blue Oaks Boulevard and Phillip Road. At buildout, the project would support approximately 946 employees and 1,550–1,650 residents.

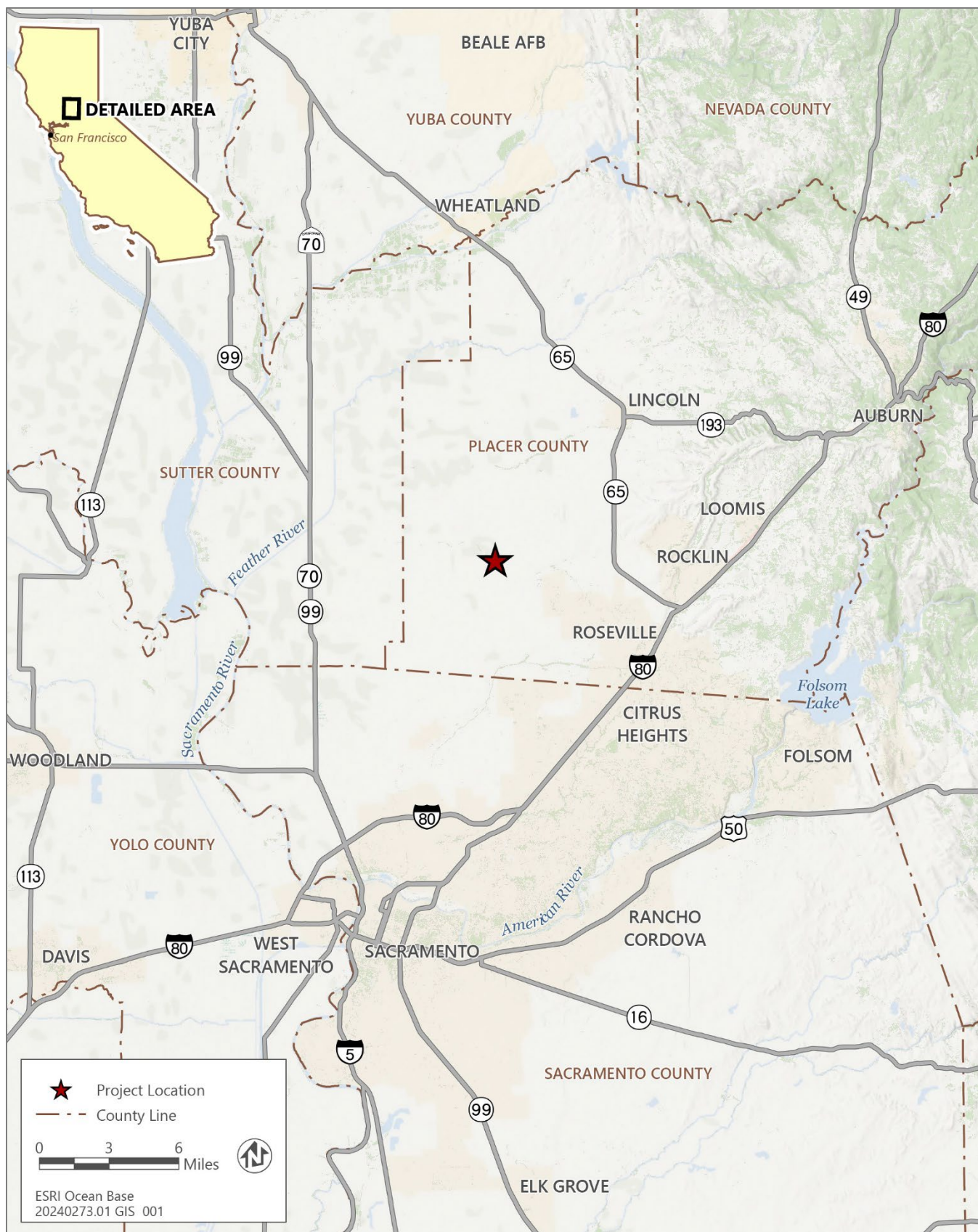
#### 3.1 PROJECT LOCATION AND SETTING

The project would be located at 6382 Phillip Road on approximately 241 acres of undeveloped grazing land in the northwest corner of Roseville, in Placer County. The project site (see Figures 1 and 2), which is currently owned by the City, is predominantly flat with some sparsely vegetated, low hills. Pleasant Grove Creek traverses the property in an east–west direction, bisecting the site into northern and southern portions. Due to previous farming activities at the project site, the original hydrology/drainage has been modified over 70+ years. The southern portion of the site was used more recently for flood control purposes (constructed channel).

Of the total 241 acres, approximately 176 acres are being considered for development pursuant to this application with approximately 6.8 acres for Blue Oaks Boulevard and Phillip Road extensions/widening. The remaining 57.9 acres are composed of approximately 13.6 acres of the Pleasant Grove Creek Floodplain and Pleasant Grove Creek Bypass Channel, approximately 21.7 acres of undevelopable land northwest of the future Placer Parkway (which is not part of the application), and approximately 22.7 acres for the planned Placer Parkway alignment. (The future Placer Parkway, a planned regional facility, would connect Highway 65 in Placer County to Highway 99 in Sutter County, providing an alternate highway to Interstate 80.)

The project site's Assessor's Parcel Number (APN) is 017-101-008-000. The existing General Plan land use designation is Public/Quasi-Public (P/QP). The project site is zoned Planned Development (PD) and allows for agricultural, recreation, and a limited number of other civic and commercial uses. As part of the project, the site would be rezoned and the General Plan would be amended to allow for the proposed land uses.

The project site is within an area of City-owned property known as Reason Farms. The Al Johnson Wildlife Area is located to the northwest of the site and is part of an area planned to accommodate the City's Pleasant Grove I Stormwater Retention Basin Facility and potential passive recreation uses. Agricultural uses are located to the west of the site. The Creekview Specific Plan (east of the project site), West Roseville Specific Plan (south of the project site), and Amoruso Ranch Specific Plan (northeast of the project site) areas are in various stages of development and will include a total of approximately 13,630 residential units at buildout. The Roseville Environmental Utilities Operations Center project is currently under consideration for development by the City and is approximately 2 miles west of the site.



Source: Adapted by Ascent in 2025.

**Figure 1 Regional Location**

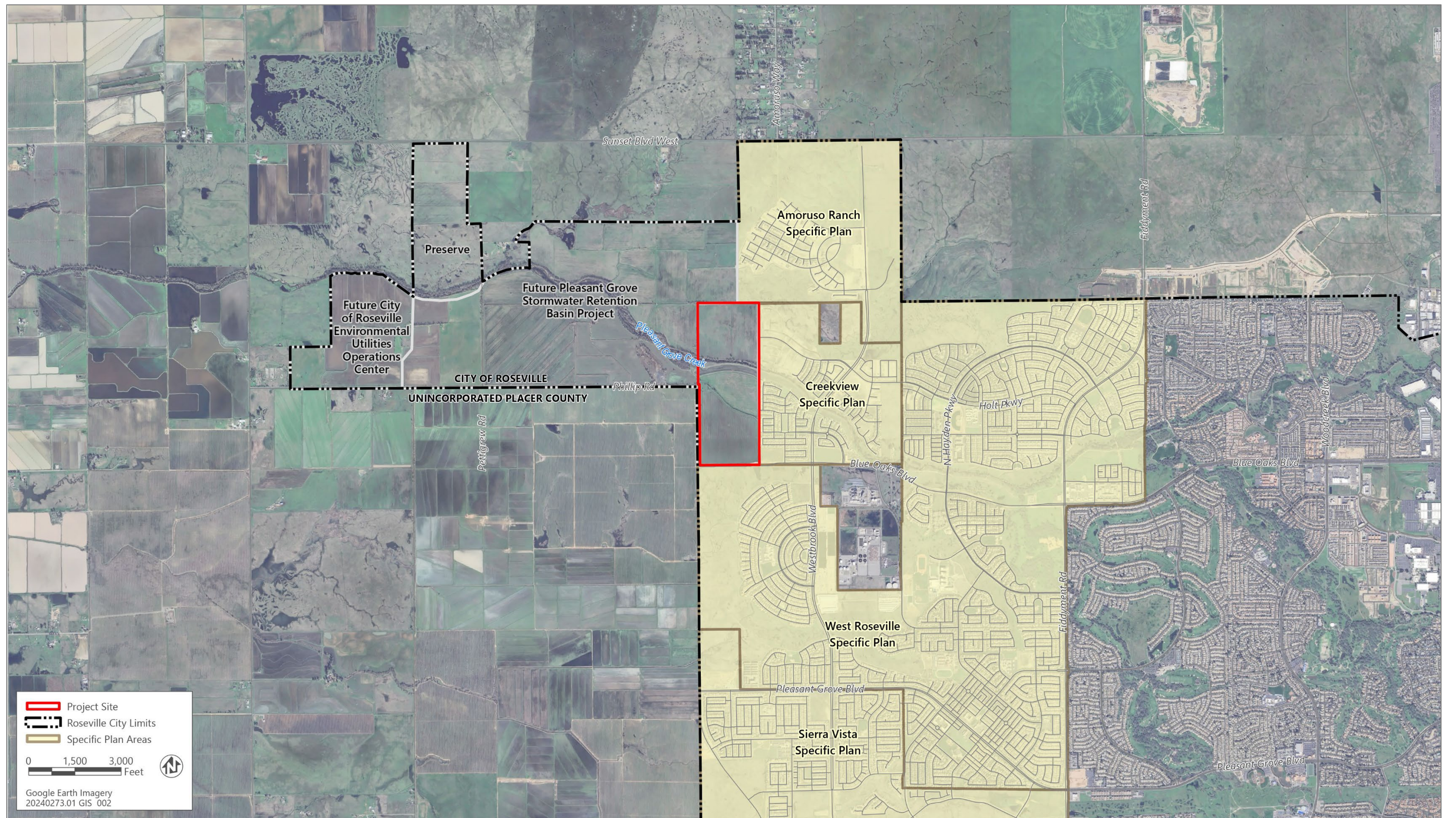


**Figure 2** Project Location and Surrounding Uses

## 3.2 PROJECT BACKGROUND

The project site is part of the City-owned property known as Reason Farms, which totals approximately 1,700 acres. The City purchased the property in 2003 for a retention basin project. The project was originally known as the Reason Farms Retention Basin Facility and was later renamed to the Pleasant Grove Stormwater Retention Basin Facility. The City is the project proponent for the facility, which is already designed and approved but not yet constructed. The EIR (SCH# 2002072084) for the retention facility was certified in 2003; a Subsequent EIR is currently being prepared by the City to evaluate changes to the retention facility. The project site is located in an area that is no longer needed for the retention basin project (which, as noted above, would be located within the Al Johnson Wildlife Area [formerly part of Reason Farms] to the northwest of the project site). The City has identified this property for development for over a decade.

A feasibility analysis of the site was done in 2006 by the City of Roseville for a potential job center, which assumed 18 buildings totaling 1,080,000 sf.

On March 3, 2021, the City Council determined that the disposition of the property was in the City's best interest and executed an Option and Purchase and Sale Agreement to Panattoni (project applicant).

## 3.3 PROJECT OBJECTIVES

The project applicant has developed the following objectives for the project:

- ▶ design a comprehensively planned community with a mix of land uses and a range of residential densities to create a balanced community;
- ▶ develop a state-of-the-art employment center designed and operated to achieve the highest and best use of the property and create substantial, permanent employment opportunities for residents of Roseville and surrounding areas;
- ▶ provide for alternative transportation through connections via a system of open space, creek crossings, paseos, and Class 1A bikeways;
- ▶ support the City of Roseville's desire to create a job-housing balance, and provide high-quality employment generating uses in western Roseville;
- ▶ provide housing options in varying densities to respond to a range of market segments, including opportunities for affordable housing consistent with the City's General Plan;
- ▶ provide a variety of housing options to help the City meet its Regional Housing Needs Allocation obligations;
- ▶ utilize, wherever feasible, alternative energy sources, including solar panels when possible;
- ▶ locate the project as near as possible to existing utility infrastructure with anticipated capacity;
- ▶ locate the project to be accessible from existing roads and minimize the need for construction of major new roadway improvements;
- ▶ include a mix of land uses and facilities which, taken together, provide a positive fiscal impact to the City's General Fund;
- ▶ plan for long-term growth to be positioned to react to market demand in multiple land use types; and
- ▶ minimize environmental impacts to surrounding areas and other sensitive land uses.

## 3.4 PROPOSED PROJECT

### LAND USE PLAN AND PROPOSED USES

The Phillip Road Project is envisioned to be a mixed-use development (see Figure 3). The project would support a mix of residential, retail, medical offices, and innovation center uses, including approximately:

- ▶ 529 single-family residential units;
- ▶ Up to 135 multi-family residential units;
- ▶ 30,084 sf of retail uses;
- ▶ 20,925 sf of medical offices;
- ▶ 1,062,041 sf of innovation center uses;
- ▶ 4.9 acres of park; and
- ▶ 13.6 acres of open space along the Pleasant Grove Creek and Pleasant Grove Creek Bypass Channel.

As shown in Figure 3, the southern portion would include residential, retail, medical offices, innovation center uses, and a park. The northern portion would include residential uses and a park. The two portions of the project site would be connected by a bridge across Pleasant Grove Creek and Pleasant Grove Creek Bypass Channel, which would remain as open space.

Landscape setbacks would be provided around the perimeter of the innovation and commercial uses as a buffer along the streets, Pleasant Grove Creek, and the proposed residential uses. The innovation and commercial buildings are proposed as site cast concrete with embellishments of corrugated metal, glass, aluminum window systems, and steel canopies.

The City requires that a minimum of 15 percent of the total proposed residential units be affordable, which equates to 93 units; however, the City has requested that the project include up to 135 high-density residential (HDR) units to provide a project of a size and scale that will be viable and also to provide greater financing flexibility for a future housing developer. Thus, the EIR will evaluate the potential environmental effects associated with the provision of 135 HDR units.

Two parks are proposed: a 3-acre park in Village 2 and a 1.9-acre park in Village 3. City of Roseville parks of this size typically include a picnic pavilion with a shade shelter, play equipment, and open turf with walking paths and perimeter planting areas. Trees are placed to provide shade and visual screening.

### PROPOSED LAND USE AND ZONING

A General Plan Amendment would be required to allow for the proposed mix-use development of the site as well as designation of the creek area as open space. Specifically, the General Plan Amendment would change the land use designation from Public/Quasi-Public (P/QP), which primarily allows for municipal and governmental facilities, to Community Commercial (CC), Light Industrial (LI), Low-Density Residential (LDR), High-Density Residential (HDR), and Open Space (OS) along Pleasant Grove Creek. Additionally, portions of the site (e.g., parks and other public areas) would remain in the P/QP land use designation.

The project includes rezoning the site from PD to a mix of uses, including Community Commercial (CC), Innovation Tech Park (ITP), Public Quasi-Public (P/QP), Small Lot Residential (RS), Multi-Family Housing (R3), and OS. Additionally, a special area overlay would be applied to a portion of the project site for Planned Development (PD) and Development Standards (DS). The Innovation Tech Park (ITP) is a new zoning designation being proposed as part of this application. The proposed uses in the ITP zone are provided in the project application. The ITP zone will also preclude certain industrial uses, such as Warehouse and Distribution.

## **ELECTRICAL SUBSTATION**

The project includes construction of an electrical substation to provide the necessary power to the project. The substation would be 225 feet by 175 feet. Although substation design is not completed yet, the substation would likely consist of a steel structure, approximately 40 feet tall.

Two 60-kilovolt (kV) overhead power lines would need to be extended along the south side of Blue Oaks Boulevard, starting at the southeast corner of Westbrook Boulevard and through the project site on the commercial side to the substation.

## **CIRCULATION AND PARKING**

The main entry to the project site would be from Blue Oaks Boulevard via a new public roadway (collector Road A), as shown in Figure 3. The new public roadway would extend through most of the project site in a north-south direction and would separate the residential uses from the innovation and commercial uses. A bridge would be constructed across Pleasant Grove Creek and the Pleasant Grove Creek Bypass Channel to connect the northern and southern portions of the site (Figure 3). The bridge would provide two travel lanes, a shoulder, a pedestrian and bicycle path on the east side, and a sidewalk on the west side.

In addition to the new public roadway, multiple internal roadways would provide access to the residential uses. Access to the innovation and commercial uses would be provided via Blue Oaks Boulevard, Phillip Road, and the new public roadway. A surface parking lot would provide parking and circulation for the innovation and commercial uses. The project would include 1,718 total parking stalls (including standard, accessible, compact, and electrical vehicle-capable), which is more parking than is required per City code.

A bicycle trail would be installed along the south side of Pleasant Grove Creek Bypass Channel (Figure 3). This would be a 10-foot-wide, paved, Class I trail that would continue the existing trail within the Creekview subdivision to the east of the project site. The project would also include construction of a 10-foot wide, paved, Class I trail at the northern end of the project site, connecting the Winding Creek Neighborhood to a future bike lane, leading up to Amoruso Ranch.

## **UTILITIES**

Utility service is not currently available at the project site. Thus, the project will require the extension of nearby potable water, recycled water, wastewater, stormwater, and electrical infrastructure to serve the future development of the site.

Potable water, recycled water, and wastewater service will be provided by the City of Roseville Environmental Utilities. Potable water, recycled water, and wastewater infrastructure are anticipated to serve the southern portion of the site (south of Pleasant Grove Creek) via the Blue Oaks extension along Phillip Road west. The northern portion is intended to be served via water and wastewater pipelines that would be installed in the new public roadway extending north-south through the project site, with an additional water connection at Benchmark Drive, which is part of the Creekview Specific Plan area to the east. The project will also include installation of an onsite sewer lift station that would connect to sewer force mains on Blue Oaks Boulevard.

The drainage system will include post-construction stormwater quality measures, including bioretention and vegetated swales. Retention credits will be purchased from the City of Roseville to meet the City's retention requirements for the new development.

Electrical service will be provided by Roseville Electric, and, as noted above, will include installation of an onsite electrical substation as well as overhead electrical lines.

Solid waste collection services would be provided by the City of Roseville.

## **OFF-SITE IMPROVEMENTS**

Off-site improvements would include the extension of Blue Oaks Boulevard along the southern frontage of the project. Improvements would also be made to Phillip Road along the western frontage of the project. Additionally, off-site improvements would also include the extension of potable water, recycled water, wastewater, stormwater, and electrical infrastructure to the site, as described above.

## **PROJECT PHASING**

The project's residential component is anticipated to be developed in five phases and a general phasing plan has been provided based upon reasonable assumptions. Backbone infrastructure would be constructed beginning 2027. Subsequently, housing would be constructed in phases beginning in 2028, with each phase taking approximately one year. Full occupancy is projected to occur in 2033. Actual phasing will depend on market demand and may vary.

Depending on market demand, the project's innovation and commercial component is anticipated to be developed in four phases based upon reasonable assumptions. Backbone infrastructure would be constructed beginning 2027. The first innovation center phase could potentially start construction as early as 2028 and potentially be completed in 2029, which could overlap with the first phase of residential construction. The timing of future phases will be determined based on market readiness and tenant demand. From a market absorption and practical perspective, it could take decades for the entire innovation and commercial development to come to fruition. For the purposes of the EIR, the full buildout year is expected to be 2038.

## **CONSTRUCTION ACTIVITIES**

Construction hours would be 7:00 a.m. to 7:00 p.m. Monday through Friday. Construction could also occur 8:00 a.m. to 8:00 p.m. on Saturdays and Sundays on an as-needed basis. Additionally, nighttime construction would likely be required for large concrete pours, on an as-needed basis, starting as early as 11:00 p.m. and continuing through the following day. Per the City's noise ordinance, nighttime work would need to be approved by the City Manager. In addition, all construction equipment would be fitted with factory installed muffling devices and all construction equipment will be maintained in good working order.

As noted above, construction would be conducted over multiple phases of development. For any given phase, there would be a range of 75—125 construction workers for a given shift. Access during construction would be from Blue Oaks Boulevard.

## **PROJECT OPERATION**

Though actual tenants are not known yet, the project's innovation and commercial uses are expected to generate approximately 946 jobs at full buildout. Operational hours would vary based on the actual tenants, but typical operational hours would be 6:00 a.m. to 8:00 p.m. The project's residential component would provide housing for 1,550—1,650 residents at buildout.



Source: Image produced by Vitae, Laugenour & Meikle, and Fuhrman Leamy Land Group in 2025; Adapted by Ascent in 2025.

Figure 3 Illustrative Site Plan

## 4 PROJECT APPROVALS

Elements of the project could be subject to permitting and/or approval authority of other agencies. As the lead agency pursuant to CEQA, the City is responsible for considering the adequacy of the EIR and determining if the project should be approved. The City will be the permitting agency for the project with regards to the General Plan Amendment, Rezone, Major Project Permit, Development Agreement, Tree Permit, and Tentative Parcel Map. Other potential permits required from other agencies could include:

### Federal

- ▶ Federal Emergency Management Agency: Letter of Map Revision.
- ▶ US Army Corps of Engineers: Compliance with Section 404 of the Clean Water Act for discharge of fill to Waters of the US.

### State

- ▶ California Department of Fish and Wildlife, Region 2: Section 1602 streambed alteration agreement for construction activities that occur within the bed or bank of adjacent waterways.
- ▶ Central Valley Regional Water Quality Control Board: National Pollutant Discharge Elimination System construction stormwater permit (Notice of Intent to proceed under General Construction Permit) for disturbance of more than 1 acre, discharge permit for stormwater, and US Clean Water Act Section 401 water quality certification and California waste discharge requirements.
- ▶ Central Valley Flood Protection Board: US Clean Water Act, Section 408 Approval/California Encroachment permit for bridge construction.

### Local

- ▶ Placer County Air Pollution Control District: Authority to Construct/Permit to Operate, and Air Quality Management Plan consistency determination.

## 5 PROBABLE ENVIRONMENTAL EFFECTS AND SCOPE OF THE EIR

The City anticipates that the project could potentially result in significant environmental impacts in the following resource areas, which will be further evaluated in the EIR:

- |                                                     |                                                 |
|-----------------------------------------------------|-------------------------------------------------|
| ▶ aesthetics;                                       | ▶ land use planning and agricultural resources; |
| ▶ air quality;                                      | ▶ noise and vibration;                          |
| ▶ biological resources;                             | ▶ population, employment, and housing;          |
| ▶ cultural resources;                               | ▶ public services and recreation;               |
| ▶ energy;                                           | ▶ transportation and circulation;               |
| ▶ greenhouse gas emissions and climate change;      | ▶ tribal cultural resources; and                |
| ▶ hazardous materials, wildfire, and other hazards; | ▶ utilities and service systems.                |
| ▶ hydrology and water quality;                      |                                                 |

These potential impacts will be assessed and discussed in detail in the EIR, and feasible and practicable mitigation measures will be recommended to reduce any identified significant or potentially significant impacts.

The City anticipates that the project will not result in significant environmental impacts in the following resource areas, which will not be further evaluated in the EIR: geology and soils and mineral resources. The EIR will include brief explanations as to why significant impacts to these resources are not anticipated.

As required by CEQA, the EIR will evaluate alternatives to the project. As stated in the State CEQA Guidelines Section 15126.6(c), the primary intent of the alternatives evaluation in an EIR is to evaluate a range of alternatives to the project that “could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.” CEQA also requires that the project alternatives analysis include consideration of the “no project” alternative.

The EIR will also evaluate the cumulative impacts of the project. As stated in State CEQA Guidelines Section 15065(a)(3), projects should be evaluated to determine whether the project’s impacts are “cumulatively considerable,” which means that the “incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.”



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
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**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



July 1, 2025

Shelby Maples  
Associate Planner  
City of Roseville Development Services – Planning  
311 Vernon Street  
Roseville, CA 95678  
[smaples@roseville.ca.us](mailto:smaples@roseville.ca.us)

Subject: INFILL PCL 373 – PHILLIP ROAD SITE, FILE #PL24-1010  
NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT  
SCH No. 2025060240

Dear Shelby Maples:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Preparation of an Environmental Impact Report (EIR) from City of Roseville Development Services – Planning (City of Roseville) for the INFILL PCL 373 – Phillip Road Site, File #PL24-1010 (Project) in Placer County pursuant to the California Environmental Quality Act (CEQA) statute and guidelines.<sup>1</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, plants and their habitats. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that it, by law, may need to exercise its own regulatory authority under the Fish and Game Code (Fish & G. Code).

## **CDFW ROLE**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802.). Similarly, for purposes of CEQA, CDFW provides, as available, biological expertise during public agency

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<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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July 1, 2025

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environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

## **PROJECT DESCRIPTION SUMMARY**

The Project site is located at 6382 Phillip Road on approximately 241 acres of largely undeveloped/grazing land in the northwest corner of Roseville, in Placer County. The Project site's Assessor's Parcel Number (APN) is 017-101-008-000.

The Project consists of a proposed 176-acre mixed use development including approximately 664 residential units, 30,084 square feet (sf) of retail, 20,925 sf of medical offices, and 1,062,041 sf of innovation center uses, as well as parks, open space, and trails. The residential uses would be separated from the other proposed uses by a new north-south public roadway, which would connect to the north by a bridge across Pleasant Grove Creek and Pleasant Grove Creek Bypass Channel. The Project also includes utility extensions and improvements to Blue Oaks Boulevard and Phillip Road. A General Plan Amendment will be required to allow for the proposed mix-use development of the site as well as designation of the creek and bypass channel area as open space.

## **COMMENTS AND RECOMMENDATIONS**

CDFW offers the comments and recommendations presented below to assist the City of Roseville in adequately identifying and/or mitigating the Project's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable CDFW to adequately review and comment on the proposed Project with respect to impacts on biological resources. CDFW recommends that the forthcoming EIR address the following:

### **Project Description**

The Project description should include the whole action as defined in the CEQA Guidelines § 15378 and should include appropriate detailed exhibits disclosing the Project area including temporary impacted areas such as equipment stage area, spoils areas, adjacent infrastructure development, staging areas and access and haul roads if applicable.

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As required by § 15126.6 of the CEQA Guidelines, the EIR should include an appropriate range of reasonable and feasible alternatives that would attain most of the basic Project objectives and avoid or minimize significant impacts to resources under CDFW's jurisdiction.

### **Assessment of Biological Resources**

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the Project, the EIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats. CDFW recommends the EIR specifically include:

1. An assessment of all habitat types located within the Project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following, *The Manual of California Vegetation*, second edition (Sawyer 2009). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the Project. CDFW recommends that the California Natural Diversity Database (CNDDDB), as well as previous studies performed in the area, be consulted to assess the potential presence of sensitive species and habitats. A nine United States Geologic Survey 7.5-minute quadrangle search is recommended to determine what may occur in the region, larger if the Project area extends past one quad (see *Data Use Guidelines* on the CDFW webpage [www.wildlife.ca.gov/Data/CNDDDB/Maps-and-Data](http://www.wildlife.ca.gov/Data/CNDDDB/Maps-and-Data)). Please review the webpage for information on how to access the database to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the Project. CDFW recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.

Please note that CDFW's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the Project site. Other sources for identification of species and habitats near or adjacent to the Project area should include, but may not be limited to, State and federal resource agency lists, California Wildlife

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Habitat Relationship System, California Native Plant Society Inventory, agency contacts, environmental documents for other projects in the vicinity, academics, and professional or scientific organizations.

3. A complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code § § 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. The EIR should include the results of focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable. Species-specific surveys should be conducted in order to ascertain the presence of species with the potential to be directly, indirectly, on or within a reasonable distance of the Project activities. CDFW recommends the City of Roseville rely on survey and monitoring protocols and guidelines available at: [www.wildlife.ca.gov/Conservation/Survey-Protocols](http://www.wildlife.ca.gov/Conservation/Survey-Protocols). Alternative survey protocols may be warranted; justification should be provided to substantiate why an alternative protocol is necessary. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Some aspects of the Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought or deluge.
4. A thorough, recent (within the last two years), floristic-based assessment of special-status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see [www.wildlife.ca.gov/Conservation/Plants](http://www.wildlife.ca.gov/Conservation/Plants)).
5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).

### **Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources**

The EIR should provide a thorough discussion of the Project's potential direct, indirect, and cumulative impacts on biological resources. To ensure that Project impacts on biological resources are fully analyzed, the following information should be included in the EIR:

1. The EIR should define the threshold of significance for each impact and describe the criteria used to determine whether the impacts are significant (CEQA Guidelines, § 15064, subd. (f)). The EIR must demonstrate that the significant environmental impacts of the Project were adequately investigated and

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discussed and it must permit the significant effects of the Project to be considered in the full environmental context.

2. A discussion of potential impacts from lighting, noise, human activity, and wildlife-human interactions created by Project activities especially those adjacent to natural areas, exotic and/or invasive species occurrences, and drainages. The EIR should address Project-related changes to drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.
3. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as nearby public lands (e.g., National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Conservation or Recovery Plan, or other conserved lands).
4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. The EIR should discuss the Project's cumulative impacts to natural resources and determine if that contribution would result in a significant impact. The EIR should include a list of present, past, and probable future projects producing related impacts to biological resources or shall include a summary of the projections contained in an adopted local, regional, or statewide plan, that consider conditions contributing to a cumulative effect. The cumulative analysis shall include impact analysis of vegetation and habitat reductions within the area and their potential cumulative effects. Please include all potential direct and indirect Project-related impacts to riparian areas, wetlands, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and/or special-status species, open space, and adjacent natural habitats in the cumulative effects analysis.

### **Mitigation Measures for Project Impacts to Biological Resources**

The EIR should include appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of the construction and long-term operation and maintenance of the Project. CDFW also recommends the environmental documentation provide scientifically supported discussion regarding adequate avoidance, minimization, and/or mitigation measures to address the Project's significant impacts upon fish and wildlife and their habitat. For individual projects, mitigation must be roughly proportional to the level of impacts, including cumulative impacts, in accordance with the provisions of CEQA (Guidelines § § 15126.4(a)(4)(B), 15064, 15065, and 16355). In order for mitigation measures to be effective, they must be specific, enforceable, and feasible actions that will improve environmental conditions. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

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1. *Fully Protected Species:* Several Fully Protected Species (Fish & G. Code § § 3511, 4700) have the potential to occur within or adjacent to the Project area, including, but not limited to: white-tailed kite (*Elanus leucurus*), greater sandhill crane (*Antigone canadensis tabida*), California black rail (*Laterallus jamaicensis coturniculus*), northern California ringtail (*Bassariscus astutus raptor*), bald eagle (*Haliaeetus leucocephalus*), and golden eagle (*Aquila chrysaetos*). Project activities described in the EIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. If fully protected species cannot be completely avoided, the Project should obtain incidental take coverage for all species that have the potential to be present within or adjacent to the Project Area<sup>2</sup>. CDFW also recommends the EIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that the City of Roseville include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce indirect impacts to fully protected species.
  
2. *Species of Special Concern:* Several Species of Special Concern (SSC) have the potential to occur within or adjacent to the Project area, including, but not limited to: western spadefoot (*Spea hammondi*), northern harrier (*Circus hudsonius*), redhead (*Aythya americana*), Vauxs swift (*Chaetura vauxi*), lesser sandhill crane (*Antigone canadensis canadensis*), purple martin (*Progne subis*), yellow-headed blackbird (*Xanthocephalus xanthocephalus*), yellow-breasted chat (*Icteria virens*), loggerhead shrike (*Lanius ludovicianus*), yellow warbler (*Setophaga petechia*), grasshopper sparrow (*Ammodramus savannarum*), song sparrow - Modesto population (*Melospiza melodia pop. 1*), long-eared owl (*Asio otus*), American badger (*Taxidea taxus*), pallid bat (*Antrozous pallidus*), northwestern pond turtle (*Actinemys marmorata*), and coast horned lizard (*Phrynosoma blainvillii*). Project activities described in the EIR should be designed to avoid any SSC that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the EIR fully analyze potential adverse impacts to SSC due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends the City of Roseville include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce impacts to SSC.
  
3. *Sensitive Plant Communities:* CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer 2009). The EIR should include

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<sup>2</sup> CDFW may only issue incidental take permits for specified projects if certain conditions are satisfied per SB 147.

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measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts.

4. *Native Wildlife Nursery Sites*: CDFW recommends the EIR fully analyze potential adverse impacts to native wildlife nursery sites, including but not limited to bat maternity roosts. Based on review of Project materials, aerial photography, and observation of the site from public roadways, the Project site contains potential nursery site habitat for structure and tree roosting bats and is near potential foraging habitat. Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment, (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). CDFW recommends that the EIR fully identify the Project's potential impacts to native wildlife nursery sites, and include appropriate avoidance, minimization and mitigation measures to reduce impacts or mitigate any potential significant impacts to bat nursery sites.
5. *Mitigation*: CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the EIR should include mitigation measures for adverse Project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, onsite habitat restoration, enhancement, or permanent protection should be evaluated and discussed in detail. If onsite mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, offsite mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

The EIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

6. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in the regional ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across

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a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be appropriately timed to ensure the viability of the seeds when planted. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate. Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the Project. Examples may include retention of woody material, logs, snags, rocks, and brush piles. Fish and Game Code sections 1002, 1002.5 and 1003 authorize CDFW to issue permits for the take or possession of plants and wildlife for scientific, educational, and propagation purposes. Please see our website for more information on Scientific Collecting Permits at [www.wildlife.ca.gov/Licensing/Scientific-Collecting/53949678-regulations-](http://www.wildlife.ca.gov/Licensing/Scientific-Collecting/53949678-regulations-).

7. *Nesting Birds*: Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). CDFW implemented the MBTA by adopting the Fish and Game Code section 3513. Fish and Game Code sections 3503, 3503.5 and 3800 provide additional protection to nongame birds, birds of prey, their nests and eggs. Sections 3503, 3503.5, and 3513 of the Fish and Game Code afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the Fish and Game Code or any regulation made pursuant thereto; section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by the Fish and Game Code or any regulation adopted pursuant thereto; and section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

Potential habitat for nesting birds and birds of prey is present within the Project area. The Project should disclose all potential activities that may incur a direct or indirect take to nongame nesting birds within the Project footprint and its vicinity. Appropriate avoidance, minimization, and/or mitigation measures to avoid take must be included in the EIR.

CDFW recommends the EIR include specific avoidance and minimization measures to ensure that impacts to nesting birds or their nests do not occur. Project-specific avoidance and minimization measures may include, but not be

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limited to: Project phasing and timing, monitoring of Project-related noise (where applicable), sound walls, and buffers, where appropriate. The EIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site. In addition to larger, protocol level survey efforts (e.g., Swainson's hawk surveys) and scientific assessments, CDFW recommends a final preconstruction survey be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted earlier.

8. *Moving out of Harm's Way*: The Project is anticipated to result in the clearing of natural habitats that support native species. To avoid direct mortality, the City of Roseville should state in the EIR a requirement for a qualified biologist with the proper handling permits, will be retained to be onsite prior to and during all ground- and habitat-disturbing activities. Furthermore, the EIR should describe that the qualified biologist with the proper permits may move out of harm's way special-status species or other wildlife of low or limited mobility that would otherwise be injured or killed from Project-related activities, as needed. The EIR should also describe qualified biologist qualifications and authorities to stop work to prevent direct mortality of special-status species. CDFW recommends fish and wildlife species be allowed to move out of harm's way on their own volition, if possible, and to assist their relocation as a last resort. It should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for habitat loss.
9. *Translocation of Species*: CDFW generally does not support the use of relocation, salvage, and/or transplantation as the sole mitigation for impacts to rare, threatened, or endangered species as these efforts are generally experimental in nature and largely unsuccessful. Therefore, the EIR should describe additional mitigation measures utilizing habitat restoration, conservation, and/or preservation, in addition to avoidance and minimization measures, if it is determined that there may be impacts to rare, threatened, or endangered species.

The EIR should incorporate mitigation performance standards that would ensure that impacts are reduced to a less-than-significant level. Mitigation measures proposed in the EIR should be made a condition of approval of the Project. Please note that obtaining a permit from CDFW by itself with no other mitigation proposal may constitute mitigation deferral. CEQA Guidelines section 15126.4, subdivision (a)(1)(B) states that formulation of mitigation measures should not be deferred until some future time. To avoid deferring mitigation in this way, the EIR should describe avoidance, minimization and mitigation measures that would be implemented should the impact occur.

### **California Endangered Species Act**

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in "take" (Fish & G. Code § 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch,

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capture, or kill”) of State-listed CESA species, either through construction or over the life of the Project.

State-listed or candidate species with the potential to occur in the area include, but are not limited to: Crotch’s bumble bee (*Bombus crotchii*), burrowing owl (*Athene cunicularia*), western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), willow flycatcher (*Empidonax traillii*), Bogg’s Lake hedge-hyssop (*Gratiola heterosepala*), Swainson’s hawk (*Buteo swainsoni*), tricolored blackbird (*Agelaius tricolor*), bank swallow (*Riparia riparia*), and giant garter snake (*Thamnophis gigas*).

The EIR should disclose the potential of the Project to take State-listed species and how the impacts will be avoided, minimized, and mitigated. Please note that mitigation measures that are adequate to reduce impacts to a less-than significant level to meet CEQA requirements may not be enough for the issuance of an ITP. To facilitate the issuance of an ITP, if applicable, CDFW recommends the EIR include measures to minimize and fully mitigate the impacts to any State-listed species the Project has potential to take. CDFW encourages early consultation with staff to determine appropriate measures to facilitate future permitting processes and to engage with the U.S. Fish and Wildlife Service and/or National Marine Fisheries Service to coordinate specific measures if both State and federally listed species may be present within the Project vicinity.

### **Native Plant Protection Act**

The Native Plant Protection Act (Fish & G. Code §1900 *et seq.*) prohibits the take or possession of State-listed rare and endangered plants, including any part or product thereof, unless authorized by CDFW or in certain limited circumstances. Take of State-listed rare and/or endangered plants due to Project activities may only be permitted through an ITP or other authorization issued by CDFW pursuant to California Code of Regulations, Title 14, section 786.9 subdivision (b).

### **Lake and Streambed Alteration Program**

The EIR should identify all perennial, intermittent, and ephemeral rivers, streams, lakes, other hydrologically connected aquatic features, and any associated biological resources/habitats present within the entire Project footprint (including utilities, access and staging areas). The environmental document should analyze all potential temporary, permanent, direct, indirect and/or cumulative impacts to the above-mentioned features and associated biological resources/habitats that may occur because of the Project. If it is determined the Project will result in significant impacts to these resources the EIR shall propose appropriate avoidance, minimization and/or mitigation measures to reduce impacts to a less-than-significant level.

Section 1602 of the Fish and Game Code requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following:

1. Substantially divert or obstruct the natural flow of any river, stream or lake;
2. Substantially change or use any material from the bed, channel or bank of any

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river, stream, or lake; or

3. Deposit debris, waste or other materials where it may pass into any river, stream or lake.

Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

If upon review of an entity's notification, CDFW determines that the Project activities may substantially adversely affect an existing fish or wildlife resource, a Lake and Streambed Alteration (LSA) Agreement will be issued which will include reasonable measures necessary to protect the resource. CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if one is necessary, the EIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the Project may avoid or reduce impacts to fish and wildlife resources. All LSA Notification types must be submitted online through CDFW's Environmental Permit Information Management System (EPIMS). For more information about EPIMS, please visit <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>. More information about LSA Notifications, paper forms and fees may be found at <https://www.wildlife.ca.gov/Conservation/Environmental-Review/LSA>.

Please note that other agencies may use specific methods and definitions to determine impacts to areas subject to their authorities. These methods and definitions often do not include all needed information for CDFW to determine the extent of fish and wildlife resources affected by activities subject to Notification under Fish and Game Code section 1602. Therefore, CDFW does not recommend relying solely on methods developed specifically for delineating areas subject to other agencies' jurisdiction (such as United States Army Corps of Engineers) when mapping lakes, streams, wetlands, floodplains, riparian areas, etc. in preparation for submitting a Notification of an LSA.

CDFW relies on the lead agency environmental document analysis when acting as a responsible agency issuing an LSA Agreement. CDFW recommends lead agencies coordinate with us as early as possible, since potential modification of the proposed Project may avoid or reduce impacts to fish and wildlife resources and expedite the Project approval process.

The following information will be required for the processing of an LSA Notification and CDFW recommends incorporating this information into any forthcoming CEQA document(s) to avoid subsequent documentation and Project delays:

1. Mapping and quantification of lakes, streams, and associated fish and wildlife habitat (e.g., riparian habitat, freshwater wetlands, etc.) that will be temporarily

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and/or permanently impacted by the Project, including impacts from access and staging areas. Please include an estimate of impact to each habitat type.

2. Discussion of specific avoidance, minimization, and mitigation measures to reduce Project impacts to fish and wildlife resources to a less-than-significant level. Please refer to section 15370 of the CEQA Guidelines.

Based on review of Project materials, aerial photography and observation of the site from public roadways, the Project site supports Pleasant Grove Creek, tributaries, and associated riparian habitat. CDFW recommends the EIR fully identify the Project's potential impacts to the stream and/or its associated vegetation and wetlands.

## **ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB field survey form can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be submitted online or mailed electronically to CNDDDB at the following email address: [CNDDDB@wildlife.ca.gov](mailto:CNDDDB@wildlife.ca.gov).

## **FILING FEES**

The Project, as proposed, would have an effect on fish and wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the City of Roseville and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code § 711.4; Pub. Resources Code, § 21089.)

## **CONCLUSION**

Pursuant to Public Resources Code sections 21092 and 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the Project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to [R2CEQA@wildlife.ca.gov](mailto:R2CEQA@wildlife.ca.gov).

CDFW appreciates the opportunity to comment on the Notice of Preparation of the EIR for the INFILL PCL 373 – Phillip Road Site, File #PL24-1010 and recommends that the City of Roseville address CDFW's comments and concerns in the forthcoming EIR. CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts.

If you have any questions regarding the comments provided in this letter, or wish to schedule a meeting and/or site visit, please contact Patrick Moeszinger, Senior

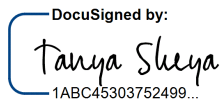
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Environmental Scientist (Specialist) at (916) 767-3935 or  
[patrick.moeszinger@wildlife.ca.gov](mailto:patrick.moeszinger@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
1ABC45303752499...

Tanya Sheya  
Environmental Program Manager

ec: Billie Wilson, Senior Environmental Scientist (Supervisory)  
Patrick Moeszinger, Senior Environmental Scientist (Specialist)  
*Department of Fish and Wildlife*

Office of Land Use and Climate Innovation, State Clearinghouse, Sacramento

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## **REFERENCES**

Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A Manual of California Vegetation, 2<sup>nd</sup> ed. California Native Plant Society Press, Sacramento, California.  
<http://vegetation.cnps.org/>

Comments:\_\_\_\_\_

How will PLACER PARKWAY  
GET TRUCKS & TRAFFIC  
TO/FROM THIS AREA?

How ABOUT BUILDING ONE OF  
THE PARKS BEFORE THE HOUSING  
SO ~~THE~~ NEARBY NEIGHBORS CAN  
ENJOY IT AND IT WILL SELL  
HOUSES FASTER?

☐ Yes, I want to stay informed about this project  
and other City of Roseville news.

Name:\_\_\_\_\_

Email address:\_\_\_\_\_

Mailing Address:\_\_\_\_\_

Comments:

PROHIBIT BIOSAFETY  
LEVEL 3 USES. MEDICAL  
OFFICES OK, but NOT  
DANGEROUS/HAZARDOUS  
USES.

☐ Yes, I want to stay informed about this project  
and other City of Roseville news.

Name: \_\_\_\_\_

Email address: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

**Comments:**

With the proposed widening  
of Blue Oaks from 65 to ?  
How many lanes are proposed  
and where ~~they~~ there are  
houses next to road will  
sound barriers be built?  
What is time estimate for  
completion?

☒ Yes, I want to stay informed about this project  
and other City of Roseville news.

Name: \_\_\_\_\_

Email address: Raren.Kazwell@gmail.com

Mailing Address: \_\_\_\_\_

**Comments:**

I own a property adjacent to the proposed development.

I have concerns regarding the land movement needed to develop the home use area.

My neighbors & I at Creekview would like to see a masonry wall separating the developments as a way to remediate the noise, dust, dirt & rodents that will 'move' into our backyards.

Thank you for considering my comment

☒ **Yes, I want to stay informed about this project and other City of Roseville news.**

Name: Mary Konow

Email address: mary.konow@creekview; rcona.org

Mailing Address: 8137 oxbow landing loop  
95747

**Comments:**

My biggest concern is traffic.

Red lights are run frequently. It seems that cars think they are on an expressway.

Why aren't traffic rules followed?

I am the VP of Creekview neighborhood & I worry about the soccer field, the continued growth of housing, apartments. How do we continue building if we don't have adequate safe roads.

☒ **Yes, I want to stay informed about this project and other City of Roseville news.**

Name: Adam & Anna Sanchez

Email address: Anna95110@gmail.com

Mailing Address: 2049 Skipping Stone Wy

**Comments:**

Urgent need of Blue Oak Road expansion  
including 2 bridges.

☒ **Yes, I want to stay informed about this project  
and other City of Roseville news.**

Name: SUBIR SEN

Email address: SS18620@yahoo.com

Mailing Address: 6080 GARLAND WAY, ROSEVILLE  
CA 95747



Comments: Please address

- o water supply for site
  - availability
  - source
- o ESA issues
  - identify & address
- o identify Roseville City Limits on maps

Thank you

☒ Yes, I want to stay informed about this project and other City of Roseville news.

Name: Gary Sprague

Email address: Spraguegr@gmail.com

Mailing Address: ~~110~~ 1740 Morella Circle  
Roseville, CA

95747

**Comments:**

A TRAFFIC ON BLUE OAKS  
IS A CRITICAL CONCERN.  
THE INCONSISTENT ROAD WIDTH  
IS NOT GOOD. NEEDS TO BE PART  
OF THE EIR

A WHAT IS THE POSSIBILITY/  
OF ADDING RUMBLE STRIPS  
TO INTERSECTIONS?

☐ **Yes, I want to stay informed about this project  
and other City of Roseville news.**

Name: MATT TRYON

Email address: MTRYON@1@YAHOO.COM

Mailing Address: 4081 WYMAN WAY

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## Central Valley Regional Water Quality Control Board

7 July 2025

Shelby Maples  
City of Roseville  
311 Vernon Street  
Roseville, CA 95678  
[smaples@roseville.ca.us](mailto:smaples@roseville.ca.us)

### **COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, INFILL PCL 373 - PHILLIP ROAD SITE PROJECT, SCH#2025060240, PLACER COUNTY**

Pursuant to the State Clearinghouse's 5 June 2025 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environmental Impact Report* for the INFILL PCL 373 - Phillip Road Site Project, located in Placer County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

#### **I. Regulatory Setting**

##### **Basin Plan**

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by

the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/](http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/)

### **Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/sacsjr\\_2018\\_05.pdf](https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf)

In part it states:

*Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.*

*This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.*

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

## **II. Permitting Requirements**

### **Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml)

**Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/municipal\\_permits/](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/)

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/phase\\_ii\\_municipal.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml)

**Clean Water Act Section 404 Permit**

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

**Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central

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<sup>1</sup> Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:  
[https://www.waterboards.ca.gov/centralvalley/water\\_issues/water\\_quality/certification/](https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality/certification/)

**Waste Discharge Requirements – Discharges to Waters of the State**

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:  
[https://www.waterboards.ca.gov/centralvalley/water\\_issues/waste\\_to\\_surface\\_water/](https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/)

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:  
[https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2004/wqo/wqo2004-0004.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf)

**Dewatering Permit**

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2003/wqo/wqo2003-0003.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf)

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:  
[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/waivers/r5-2018-0085.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf)

**Limited Threat General NPDES Permit**

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2016-0076-01.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf)

**NPDES Permit**

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.



Peter G. Minkel  
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,  
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**Yana Garcia**  
Secretary for  
Environmental Protection



**Department of Toxic Substances Control**

Katherine M. Butler, MPH, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200  
[dtsc.ca.gov](http://dtsc.ca.gov)



**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

June 11, 2025

Shelby Maples  
Associate Planner  
City of Roseville  
311 Vernon Street  
Roseville, CA 95678  
[smaples@roseville.ca.us](mailto:smaples@roseville.ca.us)

RE: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR THE INFILL PCL 373 - PHILLIP ROAD SITE DATED JUNE 5, 2025, STATE  
CLEARINGHOUSE NUMBER [2025060240](#)

Dear Shelby Maples,

The Department of Toxic Substances Control (DTSC) reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Infill PCL 373 - Phillip Road Site (Project). The project applicant proposes to purchase and develop an approximate 176-acre mixed-use development property in the City of Roseville. The Project will include approximately 664 residential units, 30,084 square feet of retail, 20,925 square feet of medical uses, and 1,062,041 square feet of innovation center uses, parks, open space, and trails.

DTSC recommends and requests consideration of the following comments:

1. When agricultural crops and/or land uses are proposed or rezoned for residential use, a number of contaminants of concern (COCs) can be present. The Lead Agency shall identify the amounts of Pesticides and Organochlorine Pesticides (OCPs) historically used on the property. If present, OCPs requiring further analysis are dichloro-diphenyl-trichloroethane, toxaphene, and dieldrin. Additionally, any level of arsenic present would require further analysis and sampling and must meet [HHRA NOTE NUMBER 3, DTSC-SLs](#)

approved local area baselines or thresholds. If they do not, remedial action must take place to mitigate them below those thresholds. Additional COCs may be found in mixing/loading/storage areas, drainage ditches, farmhouses, or any other outbuildings and should be sampled and analyzed. If smudge pots had been routinely utilized, additional sampling for Polycyclic Aromatic Hydrocarbons and/or Total Petroleum Hydrocarbons may be required.

2. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment Guidance Manual](#).

Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

DTSC would like to thank you for the opportunity to comment on the NOP of a DEIR for the Infill PCL 373 - Phillip Road Site Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via our [CEQA Review email](#) for additional guidance.

Sincerely,



Dave Kereazis

Associate Environmental Planner

HWMP-Permitting Division – CEQA Unit

Department of Toxic Substances Control

[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)

Shelby Maples

June 11, 2025

Page 3

cc: (via email)

Governor's Office of Land Use and Climate Innovation

State Clearinghouse

[state.clearinghouse@lci.ca.gov](mailto:state.clearinghouse@lci.ca.gov)

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Department of Toxic Substances Control

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**From:** [Melanie Faust](#)  
**To:** [Maples, Shelby](#)  
**Subject:** Phillips Road Site scoping  
**Date:** Monday, July 7, 2025 4:59:04 PM

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External: This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments, or taking further action.

To: Shelby Maples

Date: July 7, 2025

RE: Comments/Scoping of Draft EIR for the latest "Phillips Road Site" project

Submitted via email (comments also submitted at the scoping meeting last month)

Hi Shelby,

I submitted comments last month, but thought that I'd jot down some thoughts today as well. I wanted to mention that I did not think word of your scoping meeting was adequately distributed. Sun City Roseville hosted "listening sessions" concerning the project last summer, and the sessions filled up. I've talked to lots of people who never heard about the latest scoping meeting. I think that risks a repeat of the last cycle, when people were stunned by the Draft EIR landing sort of "out of the blue". If it would not overtax the City, perhaps the City would consider extending the deadline for scoping comments (which does not preclude the City getting started on the preparation of the Draft EIR) and perhaps holding another meeting, but this time at Sun City Roseville?

I found the project description materials at the scoping meeting somewhat confusing especially with regard to the General Plan amendment materials, and the question of what Biosafety Security Level is proposed for the project. There was no information available (at all) concerning the pertinence of the BSL 1-4 identification system. I asked a number of questions of staff at the scoping meeting about how this would be addressed in the General Plan amendment component of the project, and each one recommended speaking with the Planning Director, who was understandably engaged in other conversations with the attendees during the time I was present. This is a key question about the project. I object to the undertaking of any enterprise that requires a Biohazard/Biosafety Level higher than Level 2. No amount of "it would require a Conditional Use Permit (CUP) and that will fix everything" would suffice for a facility located in the manner that the Phillips Road site will be developed. The City's expansion of the Sphere of Influence (March 2025/LAFCO) to the Sutter and Sacramento County borders west of Roseville will offer opportunities for an appropriate Biotechnology Research and Manufacturing site. An ideal location might be adjacent to the new University satellite campus proposed for that part of West Placer County.

My comments submitted at the scoping meeting last month focused on the Biohazard/Biosafety level proposed: I continue to urge the City to restrict uses on any portion of the subject lands to Biosafety/Biohazard ("BSL") Level 1 or 2. Given the proximity to residential that is proposed now, I think it would be prudent to require a Conditional Use Permit for any industrial/quasi-industrial/biotechnology project on the subject site. But BSL 3 facilities pose an unacceptable risk of harm that cannot be mitigated to an acceptable level of safety by means of a Conditional Use Permit. BSL 4 (the most dangerous of the four levels) includes the "slate-wiper" virus, for example and would be wholly inappropriate for the

subject location (or any location within Placer County – Level 4 work is undertaken at only a handful of facilities in the United States).

**Additional park/recreational area:** The dense residential development that is now proposed along Blue Oaks Drive should have a park with play equipment and a playing field, and an indoor recreational center. Consider the Pleasant Grove affordable housing development near the intersection of Fiddymont, which includes such facilities. Families living on the edge of the busy, noisy Blue Oaks Boulevard (traffic studies should include the cumulative impacts imposed on Blue Oaks by the addition of the new west Roseville lands/Sphere of Influence change) without private yard space, should have an onsite refuge as would any other similar development. The other two residential areas (with yards) on the site each have a park/green space amenity within their neighborhood. As well, all of the neighborhoods should have a clearly developed Class IV bike path that gives people a safe transportation route separated from traffic. Ideally, the bike path would connect each park within the Phillips Road site with the bike/walking path south of/parallel to Pleasant Grove Creek.

The plans should better address how the walking/biking corridor south of Pleasant Grove Creek will connect to the west side of the boundary with the City's remaining Reason Farms land, and with the Creekview Specific Plan site to the east. A regional biking/walking corridor aligned with Pleasant Grove Creek should be protected from piecemeal development that truncates such access over time. As well, the plan should show how the continuity of this corridor will be preserved when the Placer Parkway is constructed. The plans should also show the lighting plan for the corridor and detail how the lighting will be kept from casting light pollution into the adjacent sensitive habitat areas/Pleasant Grove creek riparian corridor. The setbacks from development should be widened significantly to protect more buffer for the habit of Pleasant Grove Creek and adjoining wetland areas, including the Bypass Channel of the creek. This change would also protect a significant number of existing trees from removal – especially on the north side of the creek corridor.

**Cumulative Impacts: Transportation:** While we applaud the reduction in trucking, concerns remain. Please ensure a comprehensive analysis of the contribution this project will make to the overall increase in traffic (and associated noise and air pollution) on corridors such as Blue Oaks, Fiddymont, Pleasant Grove, and other neighborhood connector and arterial streets. Please clarify the STAA status of Blue Oaks Blvd. Caltrans has stated that a long-ago designation of STAA for the benefit of a commercial shipping project near Foothills conferred STAA status on the entire Blue Oaks Blvd. corridor, even though no analysis of the suitability for that status was made other than for ingress/egress from the shipping facility and nearby Highway 65. The traffic analysis should identify all sensitive receptors (nursing homes, schools, assisted living, and senior residential developments such as Sun City Roseville) and evaluate increased risks to occupants of these areas posed by the construction and operational phases of the proposed project. Many residents of Sun City Roseville have asked whether sound impacts could be better buffered by modified walls along Blue Oaks Blvd. Please consider whether existing walls could be feasibly modified for better sound reduction, for example.

**Transportation safety:** The Environmental Impact Report (EIR) should also address the risks posed by transportation of materials associated with the business/commercial/industrial uses proposed on the subject site.

**Other hazards:** The proposed project appears to be located within the inundation footprint of a potential Folsom Dam failure. The City's current Multi-Hazard Mitigation Plan map of the Folsom Dam inundation flooding hazard area cuts off at an artificial line at Reason Farms and

thus does not include the Phillips Road site. The City staff has explained that this is because the baseline maps predate the inclusion of Reason Farms within the City limits. Since the City of Roseville pushed its future development boundaries out to the Sutter and Sacramento County lines when LAFCO approved the latest Sphere of Influence change, and Reason Farms lands were incorporated into the City's limits years ago, the EIR should incorporate these considerations and update the records and maps accordingly.

Many other areas of concern would be expected in the forthcoming EIR. The protection of the biological resources on site, the question of protecting the water quality of Pleasant Grove Creek from construction and operation impacts, etc., will be of interest as always.

Thanks for considering these additional comments, Shelby. You have my contact information on record and you are welcome to call.

Best wishes, Melanie

**From:** [Josh Hickson](#)  
**To:** [Maples, Shelby](#)  
**Subject:** Scoping Comment Regarding Potential Data Center Development Under the Innovation Tech Park Zoning Designation  
**Date:** Sunday, June 29, 2025 4:39:51 PM

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Dear Ms. Maples,

I am submitting this public comment during the scoping period for the Environmental Impact Report (EIR) for the proposed Phillip Road Project (PL24-1010). I appreciate the opportunity to participate in this important phase of the CEQA process and request that the following concerns and questions be addressed in the forthcoming EIR.

1.

### **Clarification of Allowable Uses under the Innovation Tech Park (ITP) Zoning**

The Notice of Preparation (NOP) states that the project includes a rezoning to several districts, including a new zoning designation called Innovation Tech Park (ITP). The document further notes that “the proposed uses in the ITP zone are provided in the project application” and that the zone “will also preclude certain industrial uses, such as Warehouse and Distribution.”

However, it remains unclear:

- Whether data centers, cloud storage facilities, or server farms are permitted under this new zoning designation.
- Whether such uses would be allowed by right, or subject to conditional use permit (CUP) review.
- Whether the City or applicant intends to pursue such uses at a future phase of the project under the broad umbrella of “innovation” or “technology-oriented employment uses.”

I respectfully request that the EIR:

- Explicitly analyze whether data centers are allowed under the ITP zoning designation.
- Include the full proposed ITP zoning text or reference it in the EIR to ensure public transparency.
- Assess the potential impacts of data center development, should such uses be permitted, including but not limited to:
  - Electricity demand and grid capacity.
  - Water usage for cooling systems (especially given regional drought sensitivity and water rights concerns).
  - Noise and vibration impacts from HVAC and backup generator systems.
  - Nighttime lighting and 24/7 operational schedules.
  - Compatibility with surrounding land uses, including residential and ecological open space.

## 2.

### **Infrastructure Plans Suggest Potential Suitability for Data Center Use**

The NOP confirms that the project will:

- Construct a new 225' x 175' electrical substation.
- Extend 60 kV overhead power lines.
- Provide access to recycled and potable water, including the possibility of connection to sewer lift stations and large-scale drainage infrastructure.

These elements are consistent with infrastructure requirements for data center operations, which tend to require:

- High power availability.
- Constant cooling and ventilation.
- Redundant systems for uptime guarantees.

Given the specificity and scale of the utility infrastructure being proposed, the EIR should assess whether this infrastructure configuration is intended to support data centers or similarly

energy-intensive uses, regardless of whether they are explicitly identified in the application.

3.

### **Cumulative Impact and Precedent**

If data center development is allowed under the ITP zone, it may set a precedent for similar projects elsewhere in the Reason Farms area, especially given the region's rapid growth and interest from industrial-scale technology operators.

The EIR should therefore:

- Address the cumulative impacts of permitting data center-type uses within the western Roseville area and Reason Farms as a whole.
- Analyze whether permitting such uses aligns with regional land use goals, greenhouse gas reduction targets, and utility infrastructure resilience.

#### **Clarification Regarding LLM and AI Infrastructure Facilities:**

To eliminate any ambiguity in terminology and ensure that my comment cannot be dismissed due to semantic distinctions, I am including this addendum to explicitly identify the types of facilities and infrastructure that fall within the scope of my concerns:

For the purposes of this comment, the terms “data center,” “server farm,” or “cloud infrastructure facility” shall be understood to include, but are not limited to:

- Facilities intended for hosting large language models (LLMs) such as those developed by OpenAI, Meta, Anthropic, Google, Amazon, Microsoft, or similar entities;
- GPU-accelerated computing facilities for artificial intelligence training or inference;
- High-performance computing clusters or supercomputing nodes designed to process large-scale machine learning workloads;
- Buildings or campuses housing AI model training servers, including those supporting reinforcement learning, multimodal systems, or real-time inference;
- Any facility requiring constant power and cooling infrastructure for continuous server uptime, including those operating under hyperscale, colocation, or dedicated enterprise AI models;
- Facilities participating in federated AI model deployment, autonomous systems backends, or synthetic data generation at scale.

I request that any Environmental Impact Report (EIR) prepared for this project specifically evaluate the potential for these types of uses under the Innovation Tech Park (ITP) zoning designation, and if applicable, require clear restrictions or limitations to prevent high-impact uses that were not disclosed or evaluated in the initial project description.

This clarification is intended to prevent semantic mischaracterization or omission of AI-related facilities and ensure that the scope of analysis is consistent with foreseeable technological and land use trends already observed across the state and nation.

## **Closing Request**

In closing, I ask that the City of Roseville take this opportunity to clearly define and disclose the limits and allowances of the ITP zone, particularly with regard to high-energy, water-intensive, or 24-hour industrial operations such as data centers.

The EIR should contain sufficient analysis and mitigation recommendations to:

- Prevent land use drift from the current proposal toward unexamined industrial uses.
- Protect residents and natural ecosystems from the downstream effects of energy-intensive infrastructure.
- Ensure that the long-term vision for the Phillip Road site reflects true community needs, not speculative or underdefined tech-industrial conversions.

Thank you for your attention to these concerns and your continued stewardship of the CEQA process.

Sincerely,

Josh Hickson

**From:** [Christian Hooper](#)  
**To:** [Maples, Shelby](#)  
**Subject:** Scoping Comments on Phillip Road Site Project – Notice of Preparation (June 6, 2025)  
**Date:** Sunday, July 6, 2025 11:40:35 PM

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This is the first time you received an email from this sender (christianhooper0@gmail.com). Exercise caution when clicking links, opening attachments, or taking further action.

# Scoping Comments on Phillip Road Site Project – Notice of Preparation (June 6, 2025)

Via Electronic Mail  
Shelby Maples, Associate Planner  
City of Roseville Development Services – Planning  
311 Vernon Street, Roseville, CA 95678  
Email: [smaples@roseville.ca.us](mailto:smaples@roseville.ca.us)

Dear Ms. Maples:

These comments are submitted regarding the Notice of Preparation ("NOP") for the Phillip Road Site Project (File #PL24-1010, State Clearinghouse No. 2025060240) in Roseville. As concerned stakeholders, we urge the City to address the following major issues in the Environmental Impact Report ("EIR") for the Project. Each issue raised below is grounded in the California Environmental Quality Act ("CEQA") and related planning laws, focusing on significant environmental and legal deficiencies that could materially affect the project's viability. We appreciate the opportunity to provide scoping input during the NOP comment period (June 6 – July 7, 2025).

## 1. Inadequate Consideration of Flood Control and Hydrologic Impacts

**Past Flood Control Function of the Site:** The Phillip Road site is part of the City's Reason Farms property, originally acquired for the Pleasant Grove regional stormwater retention basin project. The southern portion of the site has already been used for flood control – including a detention basin and constructed channel – to manage Pleasant Grove Creek flows. Pleasant Grove Creek traverses the property east-west, bisecting the site and its floodplain. Given this history and physical setting, the EIR must rigorously analyze how developing 176+ acres of this currently undeveloped floodplain/grazing land will affect hydrology and flood risks onsite and downstream.

**Potential Flooding and Basin Segmentation:** The NOP asserts that the project site is "no longer needed" for the City's planned retention basin, which is now focused northwest in the Al Johnson Wildlife Area. However, proceeding with urban development on land previously earmarked for flood storage raises serious questions: Will the remaining retention facility be sufficient to prevent flooding without this parcel? Has the City formally updated its flood models and retention basin design to exclude the Phillip Road tract? CEQA forbids "piecemealing" connected projects – the retention basin redesign and the development proposal are inextricably linked and should be evaluated together or at least in a consistent, cumulative framework. The EIR must disclose any dependency on the separate retention basin project and ensure that removing this 241-acre area from flood management use will not impede or redirect flood flows or increase flood hazard elsewhere (Pub. Res. Code §21065; CEQA Guidelines App. G, Hydrology). Notably, Pleasant Grove Creek's floodplain and bypass channel occupy a significant portion of the site. Development may necessitate extensive fill or new levees; any such modifications demand detailed hydrologic and hydraulic modeling in the EIR.

**Requirements for EIR Analysis:** To comply with CEQA, the EIR's Hydrology/Water Quality section should thoroughly evaluate:

- **Flood Hazard Impact:** Whether project build-out (including a planned bridge over Pleasant Grove Creek) would alter natural drainage patterns or flood elevations. The EIR should use up-to-date 100-year and 200-year flood models (per SB 5 urban level of flood protection standards) to map inundation with and without the project. If portions of the site lie within FEMA-designated flood zones or the 200-year floodplain, this must be plainly disclosed and mitigated.
- **Capacity of Modified Retention System:** Substantial evidence demonstrating that the Pleasant Grove Stormwater Retention Basin (as redesigned) can accommodate regional storm flows without the Phillip Road “panhandle” area. This includes analyzing storm events where water would have historically been stored on or routed through this parcel. Any loss of flood storage or conveyance capacity should be identified as a potentially significant impact under CEQA.
- **Infrastructure and Downstream Effects:** The design and sizing of proposed drainage infrastructure (culverts, channels, the new north-south roadway bridge, etc.) and whether they maintain or improve existing flow paths. The EIR should evaluate worst-case scenarios (e.g. back-to-back major storms) to ensure the project does not exacerbate flooding for adjacent developments or sensitive areas. If the project would displace floodwaters onto other properties or into Pleasant Grove Creek at higher velocities, feasible mitigation (such as detention basins on-site, enlarged culverts, or channel improvements) must be considered.

**Relevant Plans and Policies:** The City’s own Multi-Hazard Mitigation Plan (2023) and General Plan Safety Element emphasize minimizing flood risks. The EIR should discuss consistency with these policies. For instance, if City data show this area is subject to inundation or is part of a regulated floodway, any proposal to place housing and businesses here must meet the stringent findings of Gov. Code §65865.5 (urban level of flood protection) or CEQA Guidelines §15065(a) (significance criteria for flood risk). In sum, absent a compelling, engineer-certified demonstration that developing this site will not compromise flood safety, approving the project could violate CEQA’s mandate to prevent significant avoidable environmental damage. At minimum, substantial design mitigation or project reconfiguration will be required to reduce flood-related impacts to a less-than-significant level.

## 2. Impacts to Biological Resources and Habitat Conservation

**Sensitive Habitat & Protected Species:** The Phillip Road site lies within a larger expanse of open space and wetlands known as Reason Farms – an area recognized as critical habitat for federally listed species and other sensitive wildlife. According to conservation assessments, the Reason Farms property supports *vernal pool ecosystems*, seasonal wetlands, and riparian corridors associated with Pleasant Grove Creek. These habitats are home to endangered Vernal Pool Fairy Shrimp and Vernal Pool Tadpole Shrimp, as well as other special-status species such as the California Tiger Salamander, Swainson’s Hawk (State Threatened), Burrowing Owl, and migratory waterfowl and wading birds. The City of Roseville’s own records (as cited in a recent SMUD EIR) note that Reason Farms comprises over “2,000 contiguous acres of permanently protected habitat” plus additional City-open-space lands, preserving *grasslands, oak woodlands, vernal pools and riparian habitat*. Developing 176 acres of this land would inherently cause large-scale biological impacts, including habitat loss, degradation of wetlands, and disruption of wildlife corridors.

**Loss of Vernal Pools and Wetlands:** CEQA regards the elimination or fill of jurisdictional wetlands and vernal pools as a significant impact, given these resources’ scarcity and ecological value. The prior Draft EIR for an industrial project on this site identified “numerous, substantial adverse impacts” on biological resources that could not be fully mitigated. The new EIR must not downplay these effects simply because the project now includes mixed uses. A full wetland delineation should be performed, and any vernal pools or seasonal wetlands mapped and quantified. Impacts to waters of the U.S./State trigger the need for permits from the U.S. Army Corps of Engineers and Regional Water Quality Control Board; the EIR should integrate those regulatory requirements (Clean Water Act §§404/401) into its analysis. If fill is proposed in the Pleasant Grove Creek floodplain or bypass channel, the EIR must evaluate how that affects not only hydrology but also riparian habitat continuity and species that rely on the creek corridor.

**Wildlife and Endangered Species Analysis:** We expect the EIR to include protocol-level surveys for all relevant special-status species. For example: Swainson’s Hawks – the site’s grasslands likely serve as foraging habitat within the range of nesting hawks (numerous nesting pairs are known in south Placer County). Under CEQA and CESA guidelines, loss of foraging habitat requires analysis and possible mitigation (such as habitat preservation elsewhere). Similarly, vernal pool branchiopods (fairy shrimp/tadpole shrimp) – if any vernal pool critical habitat is present on-site or immediately adjacent, consultation with the U.S. Fish & Wildlife Service will be required, and the EIR should evaluate a reasonable worst-case impact scenario (including indirect impacts from altered hydrology or water quality). The Burrowing Owl, a

California Species of Special Concern, is specifically known to inhabit flat grasslands like this site; pre-construction clearance surveys and no-disturbance buffers would be a likely mitigation measure. All such measures should be identified in the draft EIR.

**Edge Effects on Adjacent Preserves:** The Phillip Road parcel is immediately adjacent to the Reason Farms Conservation Easement and Al Johnson Wildlife Area – lands set aside for habitat preservation and flood retention. Introducing urban uses here (with lighting, noise, humans and pets, traffic, etc.) could significantly impact the ecological integrity of those preserves. The EIR should analyze edge effects such as: artificial lighting spilling into open space (affecting wildlife behavior), domestic pets preying on or disturbing wildlife, noise and nighttime activity disrupting foraging or breeding, and hydrologic changes that could dry out wetlands beyond the project footprint. Mitigation might include substantial open-space buffers, lighting design to be fully shielded and motion-activated, fencing or walls to prevent incursion into preserve areas, and long-term funding for land management to control invasive species and trash that often accompany development edges. CEQA requires that any conflicts with local habitat conservation plans or other conservation agreements be disclosed (Guidelines App. G). If Roseville is participant to the Placer County Conservation Program (or otherwise mitigating habitat loss through a regional plan), the EIR should clarify how this project fits (or conflicts) with those conservation commitments.

**Expectation for Mitigation and Alternatives:** Given the high magnitude of biological impact, the EIR should not rely on perfunctory or deferred mitigation. Feasible measures might include preserving large portions of the site as natural open space, relocating development away from the most sensitive areas (e.g. outside the Pleasant Grove Creek corridor and any vernal pool complexes), and off-site land conservation at a minimum 1:1 or greater ratio for habitat acres lost. Mitigation must be specific and enforceable (CEQA §21081.6). The No Project or Reduced Footprint alternatives take on special importance here – an alternative that leaves the site in its current open space use (or significantly limits development to less-sensitive upland areas) could avoid or substantially lessen these biological impacts. CEQA mandates a reasonable range of alternatives be considered to reduce significant effects, and a preservation-oriented alternative is clearly reasonable given the site's environmental value. We will look for a robust alternatives analysis in the EIR, rather than a cursory rejection of environmentally superior options.

In summary, the Project threatens to fragment and eradicate part of a regionally significant habitat network. The EIR must treat this with the highest level of scrutiny. Failure to adequately address and mitigate these biological impacts could render the EIR and project approvals inconsistent with CEQA's requirements and subject to legal challenge.

### **3. Land Use Policy Consistency and Procedural Deficiencies**

**General Plan and Zoning Inconsistencies:** The proposed project represents a drastic change in land use for the site – from its current General Plan designation of Public/Quasi-Public (P/QP) (intended for municipal facilities or open space) to a new patchwork of Community Commercial, Light Industrial, Low and High Density Residential, and Open Space designations. Likewise, the zoning would shift from the existing Planned Development (PD) with primarily agricultural/open space uses to multiple urban zones including a newly invented "Innovation Tech Park (ITP)" zone for over 1 million square feet of "innovation center" industrial uses. This sweeping re-designation calls into question the project's consistency with the City's General Plan 2035 policies on orderly growth, open space preservation, and infrastructure provision. CEQA requires the EIR to discuss any inconsistencies with applicable plans (Guidelines §15125(d)). We note that even the previous iteration (the 2023 Roseville Industrial Park EIR) acknowledged the industrial rezoning was inconsistent with the General Plan until amended. The City cannot simply assume a plan amendment negates all conflicts – it must analyze how the project aligns or conflicts with the *objectives* and *policies* of the current General Plan and community vision.

Key issues to address include: (a) The loss of designated public/open space land – does this conflict with General Plan Open Space Element goals or the Reason Farms retention basin plan previously adopted (the General Plan or supporting documents indicated portions of Reason Farms would remain open space for flood and recreation)? (b) Introduction of intensive industrial-commercial uses adjacent to existing and planned residential neighborhoods – how does this comport with Land Use Element policies on buffering incompatible uses, noise, and air quality protection for sensitive receptors? The City is, in effect, creating a new mixed-use district outside of any specific plan. The EIR must scrutinize whether necessary public facilities (roads, schools, parks beyond the two small parks proposed, etc.) will be adequately provided and consistent with City standards. If the project relies on amending multiple planning documents (General Plan, zoning ordinance) to force consistency, the rationale and environmental implications of those amendments should be transparently evaluated in the EIR.

**Surplus Land Act Violation and Project Validity:** It is also imperative to address the California Surplus Land Act

(SLA) compliance issues surrounding this City-owned property. The site (6382 Phillip Road) was declared “surplus” by the City Council in 2019, yet the disposition to Panattoni Development was pursued via exclusive agreements without properly offering the land for affordable housing or open space, as mandated by the SLA (Gov. Code §54220 et seq.). In fact, the California Department of Housing and Community Development (HCD) issued a Notice of Violation to the City on December 4, 2023, finding that “by entering into contracts to dispose of the Property without first complying with the procedural requirements of the SLA...the City violated the SLA”. HCD warned that if the City does not cure the violation, penalties equal to 30% of the sale price may apply and the Attorney General may pursue enforcement. This is not a mere technicality; it speaks to whether the project is being advanced on a legally sound basis.

While the SLA is a housing law, not an environmental statute, CEQA does obligate the City to disclose and consider regulatory conflicts and factors that may alter the project or its impacts. The NOP is conspicuously silent about the surplus land issue (unlike the 2021 NOP which claimed compliance) – yet the status of the land deal could affect the project description and alternatives. For example, to cure the SLA violation the City might need to include an affordable housing component beyond the 15% inclusionary minimum or even reconsider the disposition entirely. The EIR should incorporate this context in its Project Description and Alternatives analysis. At minimum, an alternative that dedicates the site (or a major portion of it) to public-serving uses or affordable housing consistent with SLA priorities should be evaluated. This could both address HCD’s concerns and reduce certain environmental impacts (for instance, a lower-intensity use or a housing-oriented project might generate less heavy truck traffic and pollution than a large “innovation” industrial park).

In summary, moving forward with entitlements while the SLA violation is unresolved may expose the City to project delays or modifications down the line. CEQA requires a stable project description and good-faith analysis of reasonably foreseeable changes. The EIR should not ignore the elephant in the room: the prospect that the project, as proposed, is premature or may need fundamental changes to comply with state law. By addressing this now, the City can avoid wasting resources on an EIR that evaluates a development scenario that cannot legally proceed or that might require a substantial redesign to include mandated affordable units.

Conclusion and Recommendations: We urge the City of Roseville to take a “hard look” at these critical issues in the EIR. Hydrology/flood control, biological resources, and land use legality are each potentially “make-or-break” topics for the Phillip Road Site Project. A robust analysis, coupled with honest disclosure of impacts and incorporation of feasible mitigation measures, is essential not only for CEQA compliance but for sound decision-making. If significant impacts cannot be mitigated – and the record already suggests challenges (e.g. unavoidable climate emissions in the prior project) – then the City must seriously consider the No Project alternative or a modified project that truly reduces environmental harm. The comment period on the NOP is the opportunity to identify such alternatives early. We specifically request that the EIR evaluate an alternative that preserves most of the site as open space or floodable land, while possibly allowing a smaller-scale development on the highest ground. This could achieve some project objectives without sacrificing the environmental functions of this unique area.

Thank you for considering these comments. We believe focusing the EIR on resolving these major concerns will not only fulfill CEQA’s requirements but also serve the public interest by ensuring that any development of the Phillip Road Site is environmentally responsible and legally defensible. We trust that our input will be incorporated into the scope of analysis. Please ensure that all significant issues raised here are addressed in the Draft EIR, and include us on the notification list for all future project updates and environmental document releases.

Sincerely,

Cohort of Concerned Citizens



## NATIVE AMERICAN HERITAGE COMMISSION

June 6, 2025

Shelby Maples  
City of Roseville  
311 Vernon Street  
Roseville CA 95678

Re: 2025060240 INFILL PCL 373-Phillip Road Site Project, Placer County

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Dear Ms. Maples:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015. If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). Both SB 18 and AB 52 have tribal consultation requirements. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

**1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:**

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

**2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

**3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

**4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

**5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

**6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
    - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i.** Protecting the cultural character and integrity of the resource.
    - ii.** Protecting the traditional use of the resource.
    - iii.** Protecting the confidentiality of the resource.
  - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

- 1. Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe. (Gov. Code §65352.3 (a)(2)).
- 2. No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
- 3. Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
- 4. Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a.** The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b.** Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

## NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

- 1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center** ([https://ohp.parks.ca.gov/?page\\_id=30331](https://ohp.parks.ca.gov/?page_id=30331)) for an archaeological records search. The records search will determine:
  - a.** If part or all of the APE has been previously surveyed for cultural resources.
  - b.** If any known cultural resources have already been recorded on or adjacent to the APE.
  - c.** If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d.** If a survey is required to determine whether previously unrecorded cultural resources are present.
- 2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.**
  - a.** The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b.** The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: [Pricilla.Torres-Fuentes@NAHC.ca.gov](mailto:Pricilla.Torres-Fuentes@NAHC.ca.gov).

Sincerely,

*Pricilla Torres-Fuentes*

Pricilla Torres-Fuentes  
Cultural Resources Analyst

cc: State Clearinghouse

July 7, 2025

Shelby Maples - Associate Planner  
City of Roseville Development Services – Planning  
311 Vernon Street  
Roseville, CA 95678

SENT VIA : smaples@roseville, ca.us

**SUBJECT: Infill PCL 373 – Phillip Road Site, File #PL24-1010**

Ms. Maples,

The Placer County Air Pollution Control District (District) thanks you for the opportunity to review and comment on the **Notice of Preparation of an Environmental Impact Report (NOP) for the Proposed Project Infill – PCL 373 – Phillip Road Site, File #PL24-1010** (Project). The District has the following comments for your consideration.

1. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permits(s) from the District. The applicant, developer, or operator of a project that includes a generator or boiler or hot water heater or a combination of water heaters should contact the District early to determine if a permit is required, and to begin the permit application process. For a water heater or boiler, if it is fueled by natural gas or propane, the threshold is 1.0 MMBtu/hr. This can be:
  - a.) any single unit rated at or greater than 1.0 MMBtu/hr; or,
  - b.) a combination of two or more units which cumulatively are rated at or greater than 1.0 MMBtu/hr if they contribute to the same process.

Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc.) with an internal combustion engine over 50 horsepower are required to have a PCAPCD permit or a California Air Resources Board portable equipment registration.

2. [District Rule 228, Fugitive Dust \(PDF\)](#), establishes standards to be met by activities generating fugitive dust. When an area to be disturbed is greater than one acre, and if required by a Condition of Approval of a discretionary permit, a dust control plan must be submitted to and approved by the District. The District has developed an application for this purpose, which can be found on the District website: <https://placerair.org/FormCenter/Air-Pollution-Control-6/Dust-Control-Form-52>. The District offers the following as a condition for the Use Permit:

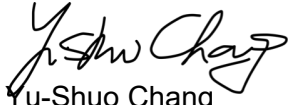
Prior to approval of Grading or Improvement Plans (whichever occurs first), on project sites greater than one acre, the applicant shall submit a Dust Control Plan to the Placer County Air Pollution Control District. The applicant shall not break ground prior to receiving District approval and delivering that approval to the local jurisdiction issuing the permit.

3. The District suggests that no wood-burning appliances, including fireplaces and woodstoves, shall be installed within any residential or commercial units associated with the Project.
4. The Project is proposing more than 1.1 million sf of Innovation Tech Park (ITP) , medical, and commercial uses. Given the proposed ITP and commercial components will share the main road with the residential components in the planning area, as the site plan presented by Figure

3, the traffic generated by the ITP and commercial components may result in considerable emissions of air pollutants and air toxics to the adjacent residential areas. The District would like to recommend that the Project EIR include a discussion with appropriate analysis on it.

Thank you for allowing the District this opportunity to review the Notice of Preparation. Please do not hesitate to contact me at 530.745.2325 or [ychang@placer.ca.gov](mailto:ychang@placer.ca.gov) if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Yu-Shuo Chang', written in a cursive style.

Yu-Shuo Chang  
Senior Planner  
Planning & Monitoring Section Supervisor

**From:** [Danielle Pohlman](#)  
**To:** [Maples, Shelby](#)  
**Subject:** Environmental Health Comments - NOP of an EIR for the Phillip Road Site Project  
**Date:** Wednesday, July 2, 2025 1:53:10 PM  
**Attachments:** [image001.png](#)

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Hi Shelby,

EH has no comments on the NOP but would like the opportunity to review the DEIR and any Phase I ESA or Phase II ESA reports conducted on the property. I don't think we reviewed them for the previously proposed project on this property.

Thanks,

*Danielle Pohlman*

Registered Environmental Health Specialist  
Placer County | Health & Human Services | Environmental Health  
Direct Line (530) 745-2390 | Main Line (530) 745-2300 | FAX (530) 745-2370  
[DPohlman@placer.ca.gov](mailto:DPohlman@placer.ca.gov) | <https://www.placer.ca.gov/3105/Environmental-Health>  
11434 B Ave, Suite 400 Auburn, CA 95603



**From:** [Placer County Environmental Coordination Services](#)  
**To:** [Maples, Shelby](#)  
**Subject:** CITY OF ROSEVILLE – NOP: PHILLIP ROAD PROJECT SITE; PHILLIP ROAD COMMENTS  
**Date:** Tuesday, July 8, 2025 8:26:13 AM  
**Attachments:** [EE\\_None.pdf](#)  
[ESD.pdf](#)  
[ESD-DPW.pdf](#)  
[EE\\_DPW.pdf](#)

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External: This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments, or taking further action.

Good morning,

Please see the attached comments for the NOP listed above.

Thank you,

**Claudia Garcia**

Associate Technician

Community Development Resource Agency | Environmental Coordination Services

3091 County Center Drive, Suite 120, Auburn, CA 95603

(530) 745-3592 / [claudiagarcia@placer.ca.gov](mailto:claudiagarcia@placer.ca.gov)

**What is your vision for Placer County's future. [Join the conversation.](#)**



**From:** [Christina Hanson](#)  
**To:** [Placer County Environmental Coordination Services](#)  
**Subject:** RE: REVIEW/COMMENT: NOP of an EIR for the Phillip Road Site Project  
**Date:** Tuesday, July 1, 2025 4:20:53 PM  
**Attachments:** [image002.png](#)

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Hello, please see my proposed comments related to Hydrology (groundwater sustainability):

The Sustainable Groundwater Management Act (SGMA) requires public agencies in certain groundwater basins to form Groundwater Sustainability Agencies (GSA) and develop and implement Groundwater Sustainability Plans (GSP). GSPs provide a framework for sustainable management of groundwater, including actions to protect and enhance groundwater supplies. Placer County along with Placer County Water Agency, City of Lincoln, and the City of Roseville, comprise the West Placer Groundwater Sustainability Agency (WPGSA) and are collectively responsible for managing groundwater and implementing the NASb GSP in the Placer County portion of the North American Subbasin (NASb).

As a WPGSA member, we respectfully submit the following comments for the Notice of Preparation of an Environmental Impact Report for the proposed Phillip Road Site Project:

1. The Draft Environmental Impact report (EIR) should evaluate the impacts to groundwater recharge as a result of increased impervious surfaces. The EIR should address the feasibility and benefits of implementing bioretention swales or other features, consistent with the West Placer Storm Water Quality Design Manual, to facilitate groundwater recharge. The West Placer Storm Water Quality Design Manual can be downloaded at the following website location:  
<https://www.placer.ca.gov/1714/Low-Impact-Development>.
2. The EIR should address the feasibility and benefits of utilizing recycled water in any practical capacity for the irrigation of green spaces, parks and landscape corridors, as well as commercial applications, where possible.
3. If the development proposes utilizing groundwater as a portion of their potable supply, the EIR should provide sufficient information to evaluate the project's risks to groundwater quality or quantity, including any potential undesirable results that would interfere with sustainable management of the basin and/or affect beneficial users and uses of groundwater. Section 8 of the GSP, Sustainable Management Criteria, includes relevant sustainability indicators and criteria used to define when significant and undesirable results would be determined to occur. The GSP can be downloaded at the following website location: <https://nasbgroundwater.org/>.

Thanks!

Chris

**Christina Hanson**

Supervising Planner  
Public Works | Environmental Engineering  
3091 County Center Drive, Suite 170, Auburn, CA 95603  
530.886.4965 direct | 530.889.6846 main | 530.886.4908 fax  
[Placer.ca.gov](http://Placer.ca.gov) | [Placerrecycles.com](http://Placerrecycles.com) | [TahoeOneBigBin.com](http://TahoeOneBigBin.com) | [LiveSewerSmart.com](http://LiveSewerSmart.com)



---

**From:** Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov>

**Sent:** Tuesday, June 10, 2025 8:40 AM

**To:** Alexander Fisch <AFisch@placer.ca.gov>; Andy Deinken <ADeinken@placer.ca.gov>; Angel Green <AGreen@placer.ca.gov>; Anne Marie Novotny <AMNovotny@placer.ca.gov>; Benjamin Mills <bmill@placer.ca.gov>; Brad Brewer <BBrewer@placer.ca.gov>; Candace Bartlett <CBartlett@placer.ca.gov>; Chris Mertens <PCFD\_CMertens@placer.ca.gov>; Christina Hanson <CHanson@placer.ca.gov>; Christopher Pahule <cpahule@placer.ca.gov>; Claudia Garcia <ClaudiaGarcia@placer.ca.gov>; Clayton Cook <CCook@placer.ca.gov>; Crystal Jacobsen <CJacobse@placer.ca.gov>; Danielle Pohlman <DPohlman@placer.ca.gov>; Dave Atkinson <DATkinso@placer.ca.gov>; Derek Schepens <PCFD\_DSchepens@placer.ca.gov>; Ed Staniforth <EStanifo@placer.ca.gov>; EELandDev <EELandDev@placer.ca.gov>; Environmental Health Front Desk <Business@placer.ca.gov>; Eric Griffin <EGriffin@placer.ca.gov>; Frederick Stamm <FStamm@placer.ca.gov>; Gabriel Armstrong <garmstrong@placer.ca.gov>; Gregg McKenzie (CDR) <GAMckenz@placer.ca.gov>; Janeane Martin <jmartin@placer.ca.gov>; Jared Deck <JDeck@placer.ca.gov>; Jennifer Byous <JByous@placer.ca.gov>; Joshua Huntsinger <JHuntsin@placer.ca.gov>; Karin Schwab <KSchwab@placer.ca.gov>; Katie Jackson <KJackson@placer.ca.gov>; Leigh Chavez <LChavez@placer.ca.gov>; Lisa Carnahan <LCarnaha@placer.ca.gov>; Meghan Schwartz <MSchwartz@placer.ca.gov>; Michele Kingsbury <MKingsbu@placer.ca.gov>; Parks Review <ParksReview@placer.ca.gov>; Paul Hellman <phellman@placer.ca.gov>; Phil Frantz <PFrantz@placer.ca.gov>; Phillip Vassion <PVassion@placer.ca.gov>; Rebecca Taber <RTaber@placer.ca.gov>; Richard Moorehead <RMoorehe@placer.ca.gov>; Ryan Woessner <PCFD\_RWoessner@placer.ca.gov>; Sarah Poindexter <SPoindex@placer.ca.gov>; Seth Warren <swarren@placer.ca.gov>; Shaun Johnson <ShaunJohnson@placer.ca.gov>; Shawna Purvines <SPurvines@placer.ca.gov>; Stacy Wydra <SWydra@placer.ca.gov>; Sue Compton <SCompton@placer.ca.gov>; Ted Rel <TRel@placer.ca.gov>

**Subject:** REVIEW/COMMENT: NOP of an EIR for the Phillip Road Site Project

Good morning,

Please review the **NOP of an EIR for the Phillip Road Site Project** and return your comments, if any, on or before **July 7, 2025**. The documents can be accessed at the following link:

[Proposed Phillip Road Site - City of Roseville](#)

Please forward this email to the appropriate staff for review/comment and also to

anyone who might also have an interest in the project.

Thanks,

**Claudia Garcia**

Associate Technician

Community Development Resource Agency | Environmental Coordination Services

3091 County Center Drive, Suite 120, Auburn, CA 95603

(530) 745-3592 / [claudiagarcia@placer.ca.gov](mailto:claudiagarcia@placer.ca.gov)

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**From:** [Janeane Martin](#)  
**To:** [Placer County Environmental Coordination Services](#)  
**Subject:** RE: REVIEW/COMMENT: NOP of an EIR for the Phillip Road Site Project  
**Date:** Tuesday, June 10, 2025 1:55:04 PM  
**Attachments:** [image002.png](#)

---

No comment from EE regarding Solid Waste.

Thanks!

*Janeane Martin*

Environmental Resources Specialist  
Department of Public Works  
Environmental Engineering  
(530) 886-4984 direct | 530.886.4908 fax

[jmartin@placer.ca.gov](mailto:jmartin@placer.ca.gov)

[Placer.ca.gov](http://Placer.ca.gov) | [PlacerRecycles.com](http://PlacerRecycles.com) | [TahoeOneBigBin.com](http://TahoeOneBigBin.com) | [LiveSewerSmart.com](http://LiveSewerSmart.com)



---

**From:** Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov>

**Sent:** Tuesday, June 10, 2025 8:40 AM

**To:** Alexander Fisch <AFisch@placer.ca.gov>; Andy Deinken <ADeinken@placer.ca.gov>; Angel Green <AGreen@placer.ca.gov>; Anne Marie Novotny <AMNovotny@placer.ca.gov>; Benjamin Mills <bmill@placer.ca.gov>; Brad Brewer <BBrewer@placer.ca.gov>; Candace Bartlett <CBartlett@placer.ca.gov>; Chris Mertens <PCFD\_CMertens@placer.ca.gov>; Christina Hanson <CHanson@placer.ca.gov>; Christopher Pahule <cpahule@placer.ca.gov>; Claudia Garcia <ClaudiaGarcia@placer.ca.gov>; Clayton Cook <CCook@placer.ca.gov>; Crystal Jacobsen <CJacobse@placer.ca.gov>; Danielle Pohlman <DPohlman@placer.ca.gov>; Dave Atkinson <DATkinso@placer.ca.gov>; Derek Schepens <PCFD\_DSchepens@placer.ca.gov>; Ed Staniforth <EStanifo@placer.ca.gov>; EELandDev <EELandDev@placer.ca.gov>; Environmental Health Front Desk <Business@placer.ca.gov>; Eric Griffin <EGriffin@placer.ca.gov>; Frederick Stamm <FStamm@placer.ca.gov>; Gabriel Armstrong <garmstrong@placer.ca.gov>; Gregg McKenzie (CDR) <GAMckenz@placer.ca.gov>; Janeane Martin <jmartin@placer.ca.gov>; Jared Deck <JDeck@placer.ca.gov>; Jennifer Byous <JByous@placer.ca.gov>; Joshua Huntsinger <JHuntsin@placer.ca.gov>; Karin Schwab <KSchwab@placer.ca.gov>; Katie Jackson <KJackson@placer.ca.gov>; Leigh Chavez <LChavez@placer.ca.gov>; Lisa Carnahan <LCarnaha@placer.ca.gov>; Meghan Schwartz <MSchwartz@placer.ca.gov>; Michele Kingsbury <MKingsbu@placer.ca.gov>; Parks Review <ParksReview@placer.ca.gov>; Paul Hellman <phellman@placer.ca.gov>; Phil Frantz <PFrantz@placer.ca.gov>; Phillip Vassion <PVassion@placer.ca.gov>; Rebecca Taber <RTaber@placer.ca.gov>; Richard Moorehead <RMoorehe@placer.ca.gov>; Ryan Woessner <PCFD\_RWoessner@placer.ca.gov>; Sarah Poindexter <SPoindex@placer.ca.gov>; Seth Warren <swarren@placer.ca.gov>; Shaun Johnson <ShaunJohnson@placer.ca.gov>; Shawna Purvines <SPurvines@placer.ca.gov>; Stacy Wydra

<SWydra@placer.ca.gov>; Sue Compton <SCompton@placer.ca.gov>; Ted Rel <TRel@placer.ca.gov>

**Subject:** REVIEW/COMMENT: NOP of an EIR for the Phillip Road Site Project

Good morning,

Please review the **NOP of an EIR for the Phillip Road Site Project** and return your comments, if any, on or before **July 7, 2025**. The documents can be accessed at the following link:

[Proposed Phillip Road Site - City of Roseville](#)

Please forward this email to the appropriate staff for review/comment and also to anyone who might also have an interest in the project.

Thanks,

**Claudia Garcia**

Associate Technician

Community Development Resource Agency | Environmental Coordination Services

3091 County Center Drive, Suite 120, Auburn, CA 95603

(530) 745-3592 / [claudiagarcia@placer.ca.gov](mailto:claudiagarcia@placer.ca.gov)

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**From:** [Sarah Gillmore](#)  
**To:** [Claudia Garcia](#)  
**Cc:** [Placer County Environmental Coordination Services](#)  
**Subject:** FW: REVIEW/COMMENT: NOP of an EIR for the Phillip Road Site Project  
**Date:** Monday, July 7, 2025 9:58:46 AM

---

Hello Claudia,

Thank you for the opportunity to review the Phillip Road Site Project. Below are the comments from Environmental Engineering:

#### Sewer and Recycled Water Utilities

The project analysis of sewer and recycled water should include other impacts on approved and future projects in the area, including Regional University Specific Plan (RUSP). The utilities serving RUSP have been studied in approved master plans and are also currently being revised in coordination with the County and City of Roseville Environmental Utilities. More detailed comments are listed below:

1. The Phillip Road Site Project offsite utilities should be sized appropriately to serve RUSP as well as any other expected development in the area.
2. The City of Roseville Environmental Utilities has proposed an interceptor gravity trunk line to address concerns of future utility overcrowding in Phillips Rd and Blue Oaks Blvd. How will this project participate in the planned final gravity trunk sewer? Details on construction timing, funding, and coordination should be provided in the environmental analysis to help clarify how this development fits into a coordinated service strategy for the greater area surrounding the Phillip Road Site Project.
3. The pump station for this site is shown to pump into a forcemain that will be running near unincorporated Placer County and has the potential for odor generation due to the length of the pipe by the time it reaches this site. The environmental analysis should include septicity, wastewater quality, and the potential for odors and how they will be mitigated.

Thanks,  
Sarah

**Sarah Gillmore, PE**  
Environmental Engineering Program Manager  
Department of Public Works | Environmental Engineering  
Cell - 530-906-7029  
[SGillmore@placer.ca.gov](mailto:SGillmore@placer.ca.gov)

---

**From:** Placer County Environmental Coordination Services <[CDRAECS@placer.ca.gov](mailto:CDRAECS@placer.ca.gov)>  
**Sent:** Tuesday, June 10, 2025 8:40 AM  
**To:** Alexander Fisch <[AFisch@placer.ca.gov](mailto:AFisch@placer.ca.gov)>; Andy Deinken <[ADeinken@placer.ca.gov](mailto:ADeinken@placer.ca.gov)>; Angel Green <[AGreen@placer.ca.gov](mailto:AGreen@placer.ca.gov)>; Anne Marie Novotny <[AMNovotny@placer.ca.gov](mailto:AMNovotny@placer.ca.gov)>; Benjamin Mills <[bmills@placer.ca.gov](mailto:bmills@placer.ca.gov)>; Brad Brewer <[BBrewer@placer.ca.gov](mailto:BBrewer@placer.ca.gov)>; Candace Bartlett

<[CBartlett@placer.ca.gov](mailto:CBartlett@placer.ca.gov)>; Chris Mertens <[PCFD\\_CMertens@placer.ca.gov](mailto:PCFD_CMertens@placer.ca.gov)>; Christina Hanson <[CHanson@placer.ca.gov](mailto:CHanson@placer.ca.gov)>; Christopher Pahule <[cpahule@placer.ca.gov](mailto:cpahule@placer.ca.gov)>; Claudia Garcia <[ClaudiaGarcia@placer.ca.gov](mailto:ClaudiaGarcia@placer.ca.gov)>; Clayton Cook <[CCook@placer.ca.gov](mailto:CCook@placer.ca.gov)>; Crystal Jacobsen <[CJacobse@placer.ca.gov](mailto:CJacobse@placer.ca.gov)>; Danielle Pohlman <[DPohlman@placer.ca.gov](mailto:DPohlman@placer.ca.gov)>; Dave Atkinson <[DAtkinso@placer.ca.gov](mailto:DAtkinso@placer.ca.gov)>; Derek Schepens <[PCFD\\_DSchepens@placer.ca.gov](mailto:PCFD_DSchepens@placer.ca.gov)>; Ed Staniforth <[ESTanifo@placer.ca.gov](mailto:ESTanifo@placer.ca.gov)>; EELandDev <[EELandDev@placer.ca.gov](mailto:EELandDev@placer.ca.gov)>; Environmental Health Front Desk <[Business@placer.ca.gov](mailto:Business@placer.ca.gov)>; Eric Griffin <[EGriffin@placer.ca.gov](mailto:EGriffin@placer.ca.gov)>; Frederick Stamm <[FStamm@placer.ca.gov](mailto:FStamm@placer.ca.gov)>; Gabriel Armstrong <[garmstrong@placer.ca.gov](mailto:garmstrong@placer.ca.gov)>; Gregg McKenzie (CDR) <[GAMckenz@placer.ca.gov](mailto:GAMckenz@placer.ca.gov)>; Janeane Martin <[jmartin@placer.ca.gov](mailto:jmartin@placer.ca.gov)>; Jared Deck <[JDeck@placer.ca.gov](mailto:JDeck@placer.ca.gov)>; Jennifer Byous <[JByous@placer.ca.gov](mailto:JByous@placer.ca.gov)>; Joshua Huntsinger <[JHuntsin@placer.ca.gov](mailto:JHuntsin@placer.ca.gov)>; Karin Schwab <[KSchwab@placer.ca.gov](mailto:KSchwab@placer.ca.gov)>; Katie Jackson <[KJackson@placer.ca.gov](mailto:KJackson@placer.ca.gov)>; Leigh Chavez <[LChavez@placer.ca.gov](mailto:LChavez@placer.ca.gov)>; Lisa Carnahan <[LCarnaha@placer.ca.gov](mailto:LCarnaha@placer.ca.gov)>; Meghan Schwartz <[MSchwartz@placer.ca.gov](mailto:MSchwartz@placer.ca.gov)>; Michele Kingsbury <[MKingsbu@placer.ca.gov](mailto:MKingsbu@placer.ca.gov)>; Parks Review <[ParksReview@placer.ca.gov](mailto:ParksReview@placer.ca.gov)>; Paul Hellman <[phellman@placer.ca.gov](mailto:phellman@placer.ca.gov)>; Phil Frantz <[PFrantz@placer.ca.gov](mailto:PFrantz@placer.ca.gov)>; Phillip Vassion <[PVassion@placer.ca.gov](mailto:PVassion@placer.ca.gov)>; Rebecca Taber <[RTaber@placer.ca.gov](mailto:RTaber@placer.ca.gov)>; Richard Moorehead <[RMoorehe@placer.ca.gov](mailto:RMoorehe@placer.ca.gov)>; Ryan Woessner <[PCFD\\_RWoessner@placer.ca.gov](mailto:PCFD_RWoessner@placer.ca.gov)>; Sarah Poindexter <[SPoindex@placer.ca.gov](mailto:SPoindex@placer.ca.gov)>; Seth Warren <[swarren@placer.ca.gov](mailto:swarren@placer.ca.gov)>; Shaun Johnson <[ShaunJohnson@placer.ca.gov](mailto:ShaunJohnson@placer.ca.gov)>; Shawna Purvines <[SPurvines@placer.ca.gov](mailto:SPurvines@placer.ca.gov)>; Stacy Wydra <[SWydra@placer.ca.gov](mailto:SWydra@placer.ca.gov)>; Sue Compton <[SCompton@placer.ca.gov](mailto:SCompton@placer.ca.gov)>; Ted Rel <[TRel@placer.ca.gov](mailto:TRel@placer.ca.gov)>  
**Subject:** REVIEW/COMMENT: NOP of an EIR for the Phillip Road Site Project

Good morning,

Please review the **NOP of an EIR for the Phillip Road Site Project** and return your comments, if any, on or before **July 7, 2025**. The documents can be accessed at the following link:

[Proposed Phillip Road Site - City of Roseville](#)

Please forward this email to the appropriate staff for review/comment and also to anyone who might also have an interest in the project.

Thanks,  
**Claudia Garcia**

Associate Technician

Community Development Resource Agency | Environmental Coordination Services  
3091 County Center Drive, Suite 120, Auburn, CA 95603  
(530) 745-3592 / [claudiagarcia@placer.ca.gov](mailto:claudiagarcia@placer.ca.gov)

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## MEMORANDUM

TO: ENVIRONMENTAL COORDINATION SERVICES

DATE: JULY 2, 2025

FROM: CANDACE BARTLETT - ESD

SUBJECT: **CITY OF ROSEVILLE – NOP: PHILLIP ROAD PROJECT SITE; PHILLIP ROAD; APN 017-101-008**

---

Thank you for the opportunity to review the above-mentioned project for concerns relating to Placer County. After reviewing the submitted information, the Community Development Resource Agency - Engineering and Surveying Division and Department of Public Works offer the following comments for your consideration regarding the proposed project:

### TRANSPORTATION/CIRCULATION

1. The proposed project is in the vicinity of the approved alignment of the Placer Parkway plan line. The EIR should include an exhibit of the approved plan line for Placer Parkway in relation to the proposed project, with dimensions. The EIR should also include a discussion of Placer Parkway and identify any impacts that the project may have on/to the approved Placer Parkway plan line. If the project site area is located within any portion of the plan line area, then highway easements should be dedicated over that portion of the plan line and no project improvements should be included within the plan line area.
2. The County requests that the project analyze intersections and roadways within Placer County as part of their Local Transportation Analysis. Please have the traffic consultant contact Phil Vassion with the Department of Public Works at (530) 745-7581 or [pvassion@placer.ca.gov](mailto:pvassion@placer.ca.gov) to discuss the roadway segments and intersections to be analyzed. The following roadways (at a minimum) should be analyzed:
  - Baseline Road
  - Fiddymont Road
  - Phillip Road
  - Placer Parkway
  - Santucci Blvd/Watt Avenue
  - South Brewer Road
  - Sunset Blvd. West

cc: Phil Vassion - DPW

**From:** [Placer Group](#)  
**To:** [Maples, Shelby](#); [City Council Mail](#)  
**Subject:** Comments on NOP for EIR, Phillip Road Site, File #PL24-1010  
**Date:** Monday, July 7, 2025 1:57:32 PM  
**Attachments:** [Placer Group SC, Phillip Rd site, 7-7-25.pdf](#)  
[Placer Group SC, General Plan, 4-28-25.pdf](#)

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Shelby and others:

Attached are comments on the Phillip Road Site project.

Also attached is a document provided for context and perspective, the Sierra Club's input to the Visioning phase of the Placer County General Plan update.

Thanks,

Harry White  
Chair, Placer Group, Mother Lode Chapter, Sierra Club



# SIERRA CLUB

## PLACER GROUP

July 7<sup>th</sup>, 2025

To:

Shelby Maples, Associate Planner, City of Roseville, [smaples@roseville.ca.us](mailto:smaples@roseville.ca.us)

Roseville City Council, [CityCouncil@roseville.ca.us](mailto:CityCouncil@roseville.ca.us)

Ladies and Gentlemen:

Thank you for the opportunity to comment on the Notice of Preparation for the Environmental Impact Report, Phillip Road Site, File #PL24-1010.

The Phillip Rd site is in a little-developed corner of Roseville, and adjacent to other natural areas with significant ecological value. As such, we believe the Phillip Rd site project should make extensive use of native plants throughout the development.

First, let's take a high-level look. Populations of insects, birds and animals are crashing both worldwide and in our area, as habitats are converted from natural vegetation to human use (agriculture, residential and commercial development).<sup>1</sup> Agriculture can leave some room for native plants and animals, but standard landscaping designs result in extinction of most local wildlife. However, it doesn't have to be this way! The solution is to build some habitat into the project itself. Use of native plants will provide a desirable feature which benefits the developer and residents (pollinator gardens that people enjoy), and as mitigation for environmental degradation.

In addition to low water usage and benefits to nature, native plants can add visual interest and provide a welcome visual change from the same old boring commercial plantings.

This is not rocket science, folks. What we are talking about here is landscaping. Landscaping. An appropriate plant palette for use as an environmental mitigation is not hard to implement.

With any landscape planning, these 8 areas need to be addressed:

Ecological value

Appearance

Water use

Cost

Maintenance

Survivability

Availability

Flammability



# SIERRA CLUB

## PLACER GROUP

All these are either favorable or manageable for use of native plants in this and other Roseville developments. Resources for selecting an appropriate plant palette are available through CNPS, Audubon Society, Xerces Society and other sources.

The idea of building some habitat along with housing is not a “fringe science” or untested idea. Many mainstream wildlife-protection groups now promote “backyard habitat” projects that can help stabilize populations of butterflies and birds. <sup>2, 3, 4, 5</sup>

We suggest that the Project Objective in section 3-3 be edited per below:

Current phrasing: Design a comprehensively planned community with a mix of land uses and a range of residential densities to create a balanced community

Suggested phrasing: Design a comprehensively planned community with a mix of land uses and a range of residential densities to create a balanced community, with extensive incorporation of native plants as an attractive and environmentally beneficial design feature.

A recent local example of successful implementation of native plants was the Gardens Gone Native Plant Tour in the Sacramento-Placer area on May 3<sup>rd</sup>. <sup>6</sup>

The Phillips Rd site has had a difficult and contentious history, and is near natural areas that are being preserved. Given this, we believe the City of Roseville and the developer should devote consideration to making this project a pilot for a better, smarter, more ecologically-sensitive (and sensible) way of building. The location of this development, concerns of local residents, and the Placer 2050 Vision and Guiding Principles Statement <sup>7</sup> all support this.

Thank you for your time and consideration.

Regards,

Harry White

Chair, Placer Group, Mother Lode Chapter, Sierra Club

[placersierraclub@gmail.com](mailto:placersierraclub@gmail.com)



# SIERRA CLUB

## PLACER GROUP

<sup>1</sup> <https://www.audubon.org/press-room/us-bird-populations-continue-alarming-decline-new-report-finds>

<sup>2</sup> <https://www.nwf.org/Native-Plant-Habitats/Create-and-Certify>

<sup>3</sup> <https://www.sacvalleynps.org/homegrown-habitat/>

<sup>4</sup> <https://homegrownnationalpark.org/>

<sup>5</sup> <https://calscape.org/design-ideas>

<sup>6</sup> <https://www.sacvalleynps.org/gardens-gone-native-tour/>

<sup>7</sup> <https://www.placer.ca.gov/9618/General-Plan-2050>

**From:** [Shannon Sinclair](#)  
**To:** [Maples, Shelby](#)  
**Subject:** Comments on Philip Rd site  
**Date:** Sunday, July 6, 2025 9:37:58 PM

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Hi Shelby

I was reviewing the proposed plans for the Philip Rd site. There is quite a bit of housing going in. May I ask what school district those homes will be in?

I ask because the schools in West Roseville are overcrowded already.

Schools in West Roseville have to shuffle 6th graders back to elementary schools due to overcrowding at the middle school level. In addition, schools are taking on more students due to the TK age change which is impacting school capacity.

I saw that the city is not building the school that was planned and is much needed in Amarus Ranch.

Could city planners share what they are doing to address this? Please include how the proposed project will also impact Westpark High.

Developers are purchasing this land for a very discounted price from the city. A great solution would be that they build their own schools for that community. The other residents of West Roseville shouldn't have to pick up the tab for the influx of housing.

Providing quality education should be a priority for city planners. Overcrowding negatively impacts students. I trust the city will do its part to safeguard and protect the best interests of our kids.

Thank you so much for your time.

Shannon

**From:** [Jeremy Sookhoo](#)  
**To:** [Maples, Shelby](#)  
**Subject:** Comments on Phillip Road Site Proposal  
**Date:** Monday, July 7, 2025 1:03:55 PM

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Ms. Maples,

Thank you for the opportunity to provide comments on the Notice of Preparation for the Phillip Road Site Project. I respectfully submit the following concerns to help inform the scope and focus of the Environmental Impact Report (EIR).

**Procedural Concerns: CEQA Timing and Surplus Land Act Violation**

It is important that the EIR address the procedural history of the City's Option and Purchase and Sale agreement for the parcel in the context of CEQA and the Surplus Land Act (SLA).

When the City originally entered into the agreement in 2021, it relied on a Class 12 Categorical Exemption under CEQA, based on the premise that the land disposition complied with the SLA. However, since that time, the California Department of Housing and Community Development issued a Notice of Violation, finding that the City did not comply with the SLA's procedural requirements. If the transaction is completed as currently structured, the City may be subject to a statutory penalty.

Given these facts, the EIR should include a transparent analysis of the implications of the SLA violation for CEQA compliance, including:

- Whether the City still relies on the Class 12 Exemption for any prior discretionary action;
- Whether the project's CEQA timeline or approvals are affected by the earlier exemption claim;
- Whether any actions taken before full CEQA review constitute premature commitment of resources, in potential conflict with CEQA Guidelines §§ 15004 and 15352.

If the City determines that the current CEQA process remains valid and unaffected, that rationale should be clearly disclosed in the EIR. However, if the current process is compromised due to reliance on a faulty exemption or premature commitment of land under an invalid surplus disposition, then the City should consider revisiting its agreement with the private developer. Addressing any procedural irregularities up front would not preclude the possibility of future development, but it would restore public trust and legal integrity to the process. The EIR should include a discussion of the City's options in that context.

**School Overcrowding and Educational Capacity**

The proposed project would introduce a significant number of new housing units to an area of West Roseville already experiencing considerable school capacity constraints. Local elementary schools—including Orchard Ranch, Riego Creek, Fiddymont Farm, and Westbrook—are facing enrollment pressures that were not fully anticipated during their planning.

Recent changes in state law expanding Transitional Kindergarten (TK) programs have brought hundreds of additional students into the system. Overcrowding has been further exacerbated by the lack of adequate middle school infrastructure, requiring 6th-grade students relocate into elementary schools in West Roseville. Further, a much-needed school planned for the Amoruso Ranch area was recently reported to be canceled due to lack of funding. In addition, it's not clear how Westpark High school enrollment or boundaries may be impacted, despite a special tax district created to fund this school.

The EIR should include a comprehensive and up-to-date analysis of public school capacity and enrollment trends in this part of the City. The analysis should assess whether the educational system can accommodate additional students generated by the project and identify feasible mitigation measures—whether through developer impact fees, school site dedication, or other commitments from the City or project applicant.

### **Placement of Sensitive Residential Uses Near High-Emission Sources**

The site plan appears to place residential uses in close proximity to major roadways and to the proposed commercial and innovation center uses, which may include diesel truck activity.

This raises potential public health concerns. Air quality studies and best practices recommend that new, sensitive uses such as residential areas be placed at least 1,000 feet from freeways or from facilities that generate 100 or more diesel truck trips per day. Based on available materials, it appears that portions of the planned residential development may be located within this 1,000-foot buffer.

The EIR should specifically evaluate:

- Whether any residential uses fall within 1,000 feet of freeways or proposed commercial/innovation uses that would generate 100 or more diesel truck trips per day;
- The nature and frequency of truck activity associated with innovation center and medical office uses, including delivery patterns and operational hours;
- Potential health impacts from long-term exposure to traffic-related air pollutants and diesel particulate matter;
- Alternatives or mitigation measures that could reduce exposure, such as increased setbacks, use restrictions, or reconfiguration of land uses.

Ensuring adequate separation between sensitive receptors and pollutant sources is critical to the long-term health and viability of the community.

I appreciate the City's efforts to invite community input early in the environmental review process. However, these concerns raise broader questions about whether this project is appropriate for approval in its current form. I urge the City to approach this project with caution and a willingness to reconsider its timing, structure, and suitability for this location.

Sincerely,  
Jeremy Sookhoo  
Roseville Resident