



STATE OF CALIFORNIA

GOVERNOR'S OFFICE of PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT



ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

Notice of Preparation

August 28, 2008

To: Reviewing Agencies

Re: Rocklin Commons
SCH# 2008082121

Attached for your review and comment is the Notice of Preparation (NOP) for the Rocklin Commons draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

David Mohlenbrok
City of Rocklin
3970 Rocklin Road
Rocklin, CA 95677

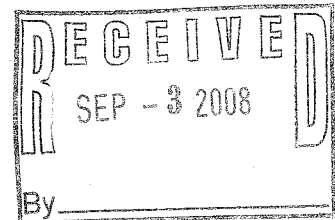
with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Assistant Deputy Director & Senior Planner, State Clearinghouse

Attachments
cc: Lead Agency



**Document Details Report
State Clearinghouse Data Base**

SCH# 2008082121
Project Title Rocklin Commons
Lead Agency Rocklin, City of

Type NOP Notice of Preparation

Description The project would allow the construction and operation of a regional shopping center with a total of approximately 17 buildings with a maximum of 415,000 square feet of retail space and about 1,828 parking stalls. A variety of retail uses are proposed for the center, including major tenants (anticipated to sell soft goods such as electronics, food, soft wares, clothing, house-wares and groceries), smaller retail stores, and restaurants. Some tenants may require drive-thrus, outside storage, outside display, outdoor vendor sales, and/or outside seasonal sales. The project may include up to 60,000 square feet of grocery sales area.

Lead Agency Contact

Name David Mohlenbrok
Agency City of Rocklin
Phone 916/625-5162
email
Address 3970 Rocklin Road
City Rocklin
Fax
State CA **Zip** 95677

Project Location

County Placer
City Rocklin
Region
Cross Streets Granite Drive, Sierra College Boulevard and I-80
Lat / Long 38° 48' 13" N / 121° 12' 28" W
Parcel No. 045-041-010,012;045-051-001,002
Township **Range** **Section** **Base**

Proximity to:

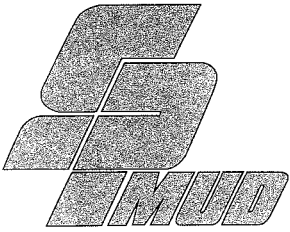
Highways I-80, SR-65
Airports
Railways UPRR
Waterways Secret Ravine Creek, Sucker Ravine Creek
Schools Sierra Community College
Land Use Vacant/Planned Development - Commercial/Retail Commercial

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Landuse

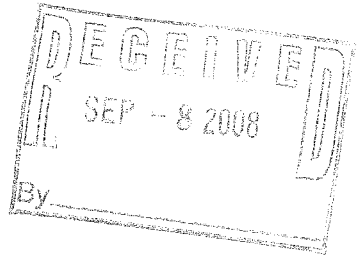
Reviewing Agencies Resources Agency; Department of Conservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Game, Region 2; Native American Heritage Commission; California Highway Patrol; Caltrans, District 3; Department of Toxic Substances Control; Regional Water Quality Control Bd., Region 5 (Sacramento)

Date Received 08/28/2008 **Start of Review** 08/28/2008 **End of Review** 09/26/2008

<input checked="" type="checkbox"/> Resources Agency Nadell Gayou	<input type="checkbox"/> Public Utilities Commission Ken Lewis	<input type="checkbox"/> Caltrans, District 8 Dan Kopulsky	<input type="checkbox"/> Regional Water Quality Control Board (RWQCB)
<input type="checkbox"/> Fish & Game Region 2 Jeff Drongesen	<input type="checkbox"/> Santa Monica Bay Restoration Guangyu Wang	<input type="checkbox"/> Caltrans, District 9 Gayle Rosander	<input type="checkbox"/> RWQCB 1 Cathleen Hudson North Coast Region (1)
<input type="checkbox"/> Fish & Game Region 3 Robert Floerke	<input type="checkbox"/> State Lands Commission Marina Brand	<input type="checkbox"/> Caltrans, District 10 Tom Dumas	<input type="checkbox"/> RWQCB 2 Environmental Document Coordinator San Francisco Bay Region (2)
<input type="checkbox"/> Fish & Game Region 4 Julie Vance	<input type="checkbox"/> Tahoe Regional Planning Agency (TRPA) Cherry Jacques	<input type="checkbox"/> Caltrans, District 11 Jacob Armstrong	<input type="checkbox"/> RWQCB 3 Central Coast Region (3)
<input type="checkbox"/> Fish & Game Region 5 Don Chadwick Habitat Conservation Program	<input type="checkbox"/> Business, Trans. & Housing	<input type="checkbox"/> Caltrans, District 12 Ryan P. Chamberlain	<input type="checkbox"/> RWQCB 4 Teresa Rodgers Los Angeles Region (4)
<input type="checkbox"/> Fish & Game Region 6 Gabrina Gatchel Habitat Conservation Program	<input type="checkbox"/> Caltrans - Division of Aeronautics Sandy Hesnard	<input checked="" type="checkbox"/> Cal EPA	<input type="checkbox"/> RWQCB 5S Central Valley Region (5)
<input type="checkbox"/> Fish & Game Region 6 I/M Gabrina Getchel Inyo/Mono, Habitat Conservation Program	<input type="checkbox"/> Caltrans - Planning Terri Pencovic	<input type="checkbox"/> Air Resources Board	<input type="checkbox"/> RWQCB 5F Central Valley Region (5) Fresno Branch Office
<input type="checkbox"/> Dept. of Fish & Game M George Isaac Marine Region	<input type="checkbox"/> California Highway Patrol Shirley Kelly Office of Special Projects	<input type="checkbox"/> Airport Projects Jim Lerner	<input type="checkbox"/> RWQCB 5R Central Valley Region (5) Redding Branch Office
<input type="checkbox"/> Other Departments	<input type="checkbox"/> Housing & Community Development CEQA Coordinator Housing Policy Division	<input type="checkbox"/> Transportation Projects Ravi Ramalingam	<input type="checkbox"/> RWQCB 6 Lahontan Region (6)
<input type="checkbox"/> Food & Agriculture Steve Shaffer Dept. of Food and Agriculture	<input type="checkbox"/> Dept. of Transportation	<input type="checkbox"/> Industrial Projects Mike Tollstrup	<input type="checkbox"/> RWQCB 6V Lahontan Region (6) Victorville Branch Office
<input type="checkbox"/> Dept. of General Services Public School Construction	<input type="checkbox"/> Caltrans, District 1 Rex Jackman	<input type="checkbox"/> California Integrated Waste Management Board Sue O'Leary	<input type="checkbox"/> RWQCB 7 Colorado River Basin Region (7)
<input type="checkbox"/> Dept. of General Services Anna Garbeff Environmental Services Section	<input type="checkbox"/> Caltrans, District 2 Marcelino Gonzalez	<input type="checkbox"/> State Water Resources Control Board Regional Programs Unit Division of Financial Assistance	<input type="checkbox"/> RWQCB 8 Santa Ana Region (8)
<input type="checkbox"/> Dept. of Public Health Veronica Malloy Dept. of Health/Drinking Water	<input type="checkbox"/> Caltrans, District 3 Bruce de Terra	<input type="checkbox"/> State Water Resources Control Board Student Intern, 401 Water Quality Certification Unit Division of Water Quality	<input type="checkbox"/> RWQCB 9 San Diego Region (9)
<input type="checkbox"/> Independent Commissions/Boards	<input type="checkbox"/> Caltrans, District 4 Lisa Carboni	<input type="checkbox"/> State Water Resources Control Board Steven Herrera Division of Water Rights	<input type="checkbox"/> Other
<input type="checkbox"/> Delta Protection Commission Debbie Eddy	<input type="checkbox"/> Caltrans, District 5 David Murray	<input type="checkbox"/> Dept. of Toxic Substances Control CEQA Tracking Center	
<input type="checkbox"/> Office of Emergency Services Dennis Castrillo	<input type="checkbox"/> Caltrans, District 6 Michael Navarro	<input type="checkbox"/> Department of Pesticide Regulation CEQA Coordinator	
<input type="checkbox"/> Governor's Office of Planning & Research State Clearinghouse	<input type="checkbox"/> Caltrans, District 7 Elmer Alvarez		
<input type="checkbox"/> Native American Heritage Comm. Debbie Treadway			
<input type="checkbox"/> Resources Agency Nadell Gayou			
<input type="checkbox"/> Dept. of Boating & Waterways David Johnson			
<input type="checkbox"/> California Coastal Commission Elizabeth A. Fuchs			
<input type="checkbox"/> Colorado River Board Gerald R. Zimmerman			
<input type="checkbox"/> Dept. of Conservation Sharon Howell			
<input type="checkbox"/> California Energy Commission Dale Edwards			
<input type="checkbox"/> Cal Fire Allen Robertson			
<input type="checkbox"/> Office of Historic Preservation Wayne Donaldson			
<input type="checkbox"/> Dept. of Parks & Recreation Environmental Stewardship Section			
<input type="checkbox"/> Central Valley Flood Protection Board Mark Herald			
<input type="checkbox"/> S.F. Bay Conservation & Dev't. Comm. Steve McAdam			
<input type="checkbox"/> Dept. of Water Resources Nadell Gayou			
<input type="checkbox"/> Conservancy			
<input type="checkbox"/> Fish and Game			
<input type="checkbox"/> Dept. of Fish & Game Scott Flint Environmental Services Division			
<input type="checkbox"/> Fish & Game Region 1 Donald Koch			
<input type="checkbox"/> Fish & Game Region 1E Laurie Hamsberger			



**SOUTH PLACER
MUNICIPAL UTILITY DISTRICT**



September 4, 2008

City of Rocklin
Community Development Department
3970 Rocklin Road
Rocklin, CA 95677

Attention: David Molenbrok

Subject: Notice of Preparation
Rocklin Commons Project
Draft Environmental Impact Report

Dear David:

The above property is within the service area of the South Placer Municipal Utility District, and is eligible for sewer service.

All sewer service which the District may hereafter provide to said lands or any portion thereof will be subject to all ordinances, resolutions, rules and regulations, taxes, charges, fees, and assessments of the SPMUD which may now or hereafter be in effect.

The design and construction of all on-site and off-site facilities which may be required as a result of this project will be the responsibility of the developer/owner. All work shall conform to the Standard Specifications of SPMUD. Improvement plans shall be submitted to SPMUD for review and approval.

This letter does not constitute a reservation of capacity in the District's sewage treatment facilities, nor does it constitute the assumption of a utility obligation to said lands or any portion thereof by the District.

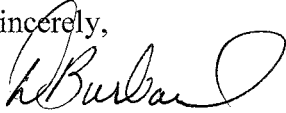
The District may be rendered unable to provide sewer service to said lands due to prohibitions or restrictions which may be imposed upon it by federal or state regulatory agencies having jurisdiction or due to conditions caused by an Act of God. Prohibitions and/or restrictions may be imposed at the Regional Wastewater Treatment Plant on the plant's capacity in accordance with existing agreements; this may also impact the District's ability to accept new applications for sewer service for the project. No restrictions currently exist.

City of Rocklin
September 4, 2008
Page -2-

This letter shall be of no force or effect after the expiration of 365 calendar days from the date hereof, but may at the discretion of the District, be renewed or extended upon application of the developer/owner of the land referred to herein or their agent.

All non residential development within SPMUD is subject to the requirements of the City of Roseville Industrial Waste Pretreatment Program in accordance with Ordinance 14.26 of the Roseville Municipal Code.

Sincerely,

A handwritten signature in black ink, appearing to read "Dari Burbano". The signature is fluid and cursive, with a large loop at the end.

Dari Burbano
Engineering Technician

DB:jg



California Regional Water Quality Control Board

Central Valley Region

Karl E. Longley, ScD, P.E., Chair



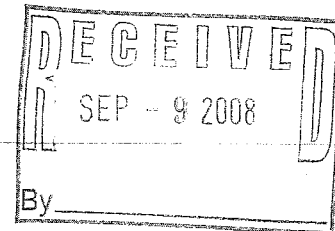
Arnold Schwarzenegger
Governor

Linda S. Adams
Secretary for
Environmental
Protection

Sacramento Main Office
11020 Sun Center Drive #200, Rancho Cordova, California 95670-6114
Phone (916) 464-3291 • FAX (916) 464-4645
<http://www.waterboards.ca.gov/centralvalley>

5 September 2008

David Mohlenbrok
City of Rocklin
3970 Rocklin road
Rocklin, CA 95677



NOTICE OF PREPARATION FOR THE ROCKLIN COMMONS DRAFT ENVIRONMENTAL REPORT (EIR), SCH# 2008082121, CITY OF ROCKLIN, PLACER COUNTY

As a Responsible Agency under CEQA, we have reviewed and commented on the Notice of Preparation for the Rocklin Commons (proposed project) Draft EIR. The proposed project is located at the cross streets of Granite Drive, Sierra College Boulevard and I-80. The proposed project consists of 4 lots totaling about 40.86 +/- acres and is currently undeveloped land. The proposed project would allow the construction and operation of a regional shopping center with a total of approximately 17 buildings with a maximum of 415,000 square feet of retail space and about 1,828 parking stalls. A variety of retail uses are proposed for the center, including major tenants, smaller retail stores, and restaurants. Some tenants may require drive-thrus, outside storage, outside display, outdoor vendor sales, and/or outside seasonal sales. The project may include up to 60,000 square feet of grocery sales area.

Most of the site is open oak woodland with some open areas of annual grassland. Within the site there are five small seasonal wetlands with a total acreage of 0.201 +/- acres, three seasonal wetland swales along the western side of the site with a total acreage of 0.278 +/- acres, and an irrigation ditch with a total acreage of 0.002 +/- acres, for combined overall total of 0.481 +/- acres of jurisdictional wetlands.

Adjacent waterways that could be impacted from storm water runoff include direct impacts on the Secret Ravine Creek, which is a perennial tributary of Miners Ravine which shortly thereafter runs into the Dry Creek, a tributary to the American River. The Regional Water Board considers storm water discharges from the City urbanized area to be significant sources of pollutants. In this regard, the technical section of the Draft EIR relative to the Regional Water Board's Responsible Party area includes the Hydrology and Water Quality section. In this regard, we have provided comments relative to the quality and quantity of storm water that may be discharged from this project site.

REGULATORY REQUIREMENTS

The proposed project is within the regulated area covered by the *City of Rocklin's Storm Water Discharges from Small Municipal Separate Storm Sewer System (MS4), NPDES Order No. CAS000004 (MS4 Permit), State Water Resources Control Board Water Quality (SWRCB) Order No. 2003-0005-DWQ*. An integral and enforceable part of this Order includes the Storm

Water Management Plan (SWMP) for the City of Rocklin. One of the six minimum control measures required to be specifically addressed in the SWMP includes **Post Construction Storm Water Management**. It states that the Permittee must require long-term post-construction BMPs that protect water quality and control runoff flow, to be incorporated into development and significant redevelopment projects. Post-construction programs are most efficient when they stress (i) low impact design; (ii) source controls; and (iii) treatment controls. The main goal of the MS4 Permit is to protect water quality from the impacts of storm water runoff from new development and re-development projects. The intent is that storm water quality impacts will be considered in all aspects of a municipality's activities and that multiple departments within the municipality will work together to implement storm water BMPs. For instance, the **planning department** may work with the **public works department** when considering projects and their potential storm water impacts.

Studies have found the amount of impervious surface in a community is strongly correlated with the community's water quality. New development and redevelopment result in increased impervious surfaces in a community. The design standards in Attachment 4 of the MS4 Permit focus on mitigating the impacts caused by increased impervious surfaces through establishing minimum BMP requirements that stress (i) low impact design; (ii) source controls; and (iii) treatment controls. The design standards include minimum sizing criteria for treatment controls and establish maintenance requirements.

The MS4 Permit, Attachment 4 and other required part of the MS4 Permit may be found on the State Water Resources Control Board's web site at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

COMMENTS

We have focused our review on section VIII. HYDROLOGY AND WATER QUALITY beginning on page 27 of Exhibit 2 to the Initial Study and Environmental Checklist.

1. On page 31 of Exhibit 2, it states: "Storm water runoff from the project site will be collected in stormwater drainage pipes and then directed through a sand and oil trap manhole or other Best Management Practices feature and then into the on-site detention basin, and from there into the City's storm drain system....Therefore, violations of any water quality standards or waste discharge requirements would no be anticipated."

We do not concur that these best management practices (BMPs) meet the maximum extent practicable (MEP) requirement in the City of Rocklin's MS4 permit or the SWMP. This relates to low impact development strategies discussed further in this letter.

2. On page 32 of Exhibit 2, it states: "The proposed project would not alter the course of a stream or a river. The proposed project would not substantially alter the existing drainage pattern of the site or area because the City's policy of requiring new developments to detain on-site drainage such that the rate of runoff flow is maintained

at pre-development levels (unless the Placer County Flood Control and Water Conservation District's Flood Control Manual requires otherwise) and to coordinate with other project's master plans to ensure no adverse cumulative effects would be applied. Preliminary plans indicate that the on-site flows for this project will be detained in an on-site detention basin, substantial erosion, siltation or flooding, on- or off-site, and exceedance of capacity of existing or planned drainage systems would not be anticipated to occur."

We have not been had an opportunity to review the "preliminary plans" with regards to the sizing of the detention basin based on the amount of proposed impervious surfaces versus pre-development runoff rates. Nevertheless, the one detention basin does not meet the MEP standard. This relates to hydromodification standards discussed further in this letter.

3. On page 34 of Exhibit 2, Significance, it states: Hydrology and water quality impacts have been determined to be less-than-significant; therefore, this subject area will not be further reviewed in the EIR."

We do not concur with this conclusion. This document does not provide the necessary details to determine whether the proposed project's storm water BMP design criteria meet the MEP standard for (i) low impact design; (ii) source controls; and (iii) treatment controls.

We provide the following information to clearly specify the amount of detail we require in the Draft EIR to address HYDROLOGY AND WATER QUALITY.

Water Quality Planning and Design Principles - In order to reduce pollutants and runoff flows from new development and redevelopment to the MEP, the City of Rocklin should include the following concepts in the Draft EIR:

- Incorporate water quality and watershed protection principles into planning procedures to direct land-use decisions and require implementation of consistent water quality protection measures for priority development projects. These principles and policies should be designed to protect natural water bodies and should consider, at a minimum, the following:
 - ✓ Minimize the amount of impervious surfaces and directly connected impervious surfaces in areas of new development and redevelopment where feasible to maximize on-site infiltration of runoff (low impact design practices).
 - ✓ Implement pollution prevention methods supplemented by pollutant source controls and treatment. Where practical, use strategies that control the sources of pollutants or constituents (i.e., the point where water initially meets the ground) to minimize the transport of urban runoff and pollutants offsite and into MS4s.

- ✓ Preserve, and where feasible, create or restore areas that provide important water quality benefits, such as riparian corridors, wetlands, and buffer zones (e.g., levees).
 - ✓ Limit disturbances of natural water bodies and natural drainage systems caused by development including roads, highways, and bridges.
 - ✓ Require incorporation of structural and non-structural BMPs to mitigate the projected increases in pollutant loads from future development.
 - ✓ Identify and avoid development in areas that are particularly susceptible to erosion and sediment loss; or establish development guidance that protects areas from erosion and sediment loss.
 - ✓ Coordinate with local traffic management programs to reduce pollutants associated with vehicles and increased traffic resulting from development.
 - ✓ Implement source and/or treatment controls to protect downstream receiving water quality from increased pollutant loads in runoff flows from new development and significant redevelopment, and
 - ✓ Control the post-development peak storm water run-off discharge rates and velocities to prevent or reduce downstream erosion and to protect stream habitat (hydromodification concepts).
- **Low Impact Development Strategies (LID):** On January 20, 2005, the State Water Resources Control Board adopted sustainability as a core value for all California Water Boards' activities and programs, and directed California Water Boards' staff to consider sustainability in all future policies, guidelines, and regulatory actions.

LID is a sustainable practice that benefits water supply and contributes to water quality protection. Unlike traditional storm water management, which collects and conveys storm water runoff through storm drains, pipes, or other conveyances to a centralized storm water facility, LID takes a different approach by using site design and storm water management to maintain the site's pre-development runoff rates and volumes. The goal of LID is to mimic a site's predevelopment hydrology by using design techniques that infiltrate, filter, store, evaporate, and detain runoff close to the source of rainfall. LID has been a proven approach in other parts of the country and is seen in California as an alternative to conventional storm water management. The Water Boards are advancing LID in California in various ways.

LID provides economical as well as environmental benefits. LID practices result in less disturbance of the development area, conservation of natural features, and less expensive than traditional storm water controls. The cost savings applies not only to construction costs, but also to long-term maintenance and life cycle cost. LID provides multiple opportunities to retrofit existing highly urbanized areas and can be applied to a range of lot sizes.

LID includes specific techniques, tools, and materials to control the amount of impervious surface, increase infiltration, improve water quality by reducing runoff from developed sites, and reduce costly infrastructure. LID practices include; bioretention facilities or rain gardens, grass swales and channels, vegetated rooftops, rain barrels, cisterns, vegetated filter strips, and permeable pavements.

TEN LID PRACTICES

1. Bioretention & Rain Gardens
2. Rooftop Gardens
3. Sidewalk Storage
4. Vegetated Swales, Buffers & Strips; Tree Preservation
5. Roof Leader Disconnection
6. Rain Barrels and Cisterns
7. Permeable Pavers
8. Soil Amendments
9. Impervious Surface Reduction & Disconnection
10. Pollution Prevention & good Housekeeping

Federal regulations (40 CFR 122.26) require that pollutants in storm water be reduced to the MEP. The definition of MEP has generally been applied to mean implementation of economically achievable management practices. Because storm water runoff rates can vary from storm to storm, the statistical probabilities of rainfall or runoff events become economically significant and are central to the control of pollutants through cost effective BMPs. Further, it is recommended that storm water BMPs be designed to manage both flows and water quality for best performance. It is equally important that treatment BMPs once implemented be routinely maintained.

The MEP standard involves applying BMPs that are effective in reducing the discharge of pollutants in storm water runoff. If, from a list of BMPs, a developer chooses only a few of the least expensive methods, it is likely that MEP has not been met. Alternatively, if a developer employs all applicable BMPs except those where it can show that they are not technically feasible in the locality, or whose cost would exceed any benefit to be derived, it would have met the standard. MEP requires developers choose effective BMPs, and to reject applicable BMPs only where other effective BMPs will serve the same purpose, the BMPs would not be technically feasible, or the cost would be prohibitive. MEP is the result of the cumulative effect of implementing, continuously evaluating, and making corresponding changes to a variety of technically and economically feasible BMPs that ensure the most appropriate controls are implemented in the most effective manner.

The SWRCB's web site provides a Questions and Answer Document discussing MEP and how it is defined for the Phase II Small MS4 General Permittees. You may find this page at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/smallms4faq.shtml

- **Hydromodification Management Plan (HMP)** - The HMP should include controls to manage the increases in the magnitude, volume and duration of runoff from development projects in order to protect receiving waters from increased potential for erosion and other adverse impacts. The HMP should address, but not be limited to, the following:
 - ✓ Requires incorporation of controls, including structural and non-structural BMPs, to mitigate the projected increases in flows;
 - ✓ Controls post-development runoff rates and velocities from a site to avoid adverse impact on downstream erosion, flooding and stream habitat;
 - ✓ Minimizes the quantity of stormwater directed to impermeable surfaces and the MS4s (municipal storm drain);
 - ✓ Maximizes the percentage of permeable surfaces to allow more percolation of stormwater into the ground where feasible;
 - ✓ Considers the full range of feasible BMPs; and
 - ✓ Considers various assessment methodologies designed to evaluate the existing geomorphic condition of receiving waters, along with the expected susceptibility of these receiving waters to erosion/change as a result of hydromodification from land development and other land uses.

In this regard, we recommend the City of Rocklin consider all the technically and economically feasible BMPs to mitigating potential impacts of storm water runoff from the proposed project.

We look forward to receiving the Draft EIR which incorporates these designs and planning principles. If you have any questions, please contact me at 916.464.4606 or email address kschwab@waterboards.ca.gov.



KIM A. SCHWAB, P.G.
Engineering Geologist
Storm Water Section

cc: State Clearing House
Kent Foster, Director of Public Works, City of Rocklin
Terry Richardson, Director of Community Development, City of Rocklin
Larry Wing, Planning Department, City of Rocklin
Gregg Bates, American Basin Council of Watersheds, P.O. Box 1311, Roseville, CA
95678

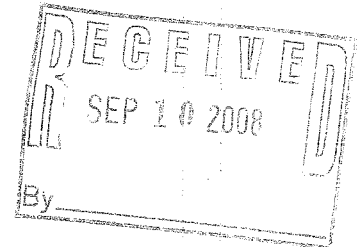
DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

California Highway Patrol
9440 Indian Hill Road
Newcastle, CA 95658
(916) 735-3344
(800) 735-2929 (TT/TDD)
(800) 735-2922 (Voice)



September 5, 2008

File No.: 220.10284.11784.SCH#2008082121



David Mohlenbrok
Community Development Department
3970 Rocklin Road
Rocklin, CA 95677

Dear Mr. Mohlenbrok:

Recently, the California Highway Patrol (CHP) Auburn Area had the opportunity to review the Notice of Preparation for the Rocklin Commons Draft Environmental Report SCH#2008082121. We believe the growth discussed will have a major impact the mission of the CHP of providing safety and service to the public as they use the highway transportation system within Placer County. The project as outlined will substantially increase traffic volume and impact the State highways and roadways within the southern portion of Placer County, primarily Interstate 80 (I-80), State Route 65 (SR-65) and north and south of the project on Sierra College Boulevard.

The effect this project will have on the Auburn CHP Area could be significant in the number of residents it will attract. The proposed plan encompasses approximately 40.86 acres of land currently in the City of Rocklin and County of Placer. The plan calls for the construction of a regional shopping center at the northwest quadrant of the Sierra College Boulevard/Interstate 80 interchange, proximate to Granite Drive on the west and Sierra College Boulevard on the east. A variety of retail outlets, using 17 buildings and 415,000 total maximum square feet, in addition to 1,828 parking stalls. This project will contribute a significant amount of traffic volume on regional roadways and intersections that would exceed their current capacity.

The Auburn CHP Area office is responsible for more than 800 square miles of area in west Placer County, which includes I-80, S.R. 49, S.R. 193, S.R. 65, and over 1,100 miles of county roadways. We are committed to providing the maximum amount of service and traffic enforcement allowable with our current staffing levels. This project will significantly impact our ability to provide traffic law enforcement services, unless additional staffing is allocated to patrol this project.

There are no immediate plans to augment the workforce in the Auburn CHP Area Office, nor are there any major roadway projects to significantly increase the traffic capacity of I-80 or SR-65. This is an area that should be discussed as this project, along with several other major developments within the immediate vicinity, will have a major impact on traffic.

In order for the Auburn CHP Area to adequately patrol the area surrounding the Rocklin Commons Project, we will need three additional officers to accommodate this project. The additional three officer positions are based on the Placer County Sheriff's Department's staffing formula for providing law enforcement services within Placer County. The PSCO formula is 1.3 personnel per 1,000 residents (1.3:1,000). PSCO is responsible for the same geographic area as the Auburn CHP Area. PSCO is responsible for handling the enforcement of criminal investigations and incidents while the Auburn CHP Area is responsible for handling enforcement of traffic investigations, traffic control and other related traffic incidents within Placer County. Using PSCO's staffing formula; the Auburn CHP Area will need one additional officer to provide traffic enforcement, accident investigation, motor services, and vehicle theft incidents.

I-80, which bisects the City of Rocklin, is currently operating at or near maximum capacity. During certain times of the day, I-80 is beyond capacity resulting in gridlock or near gridlock as traffic flows at a seriously reduced speed in both directions. Furthermore, SR-65, which is located on the north edge of Roseville, has already experienced a major increase in usage due to the growth from the cities of Lincoln, Roseville, Rocklin and unincorporated Placer County. Any significant increase in growth will further adversely affect these major routes of travel.

We thank you for allowing our comments regarding the Rocklin Commons Draft Environmental Impact Report for the Rocklin Commons Project. Through cooperative partnerships with local, county and State entities the CHP will continue to monitor the growth within western Placer County and the surrounding cities for its impact on the CHP's mission.

Sincerely,



RICK WARD, Captain
Commander
Auburn Area

cc: Assistant Chief Sal Segura, Valley Division
Captain Joe Whiteford, Special Projects Section

SOUTH PLACER WASTEWATER AUTHORITY

2005 Hilltop Circle
Roseville, CA 95747
916-774-5770
fax 916-774-5690

September 17, 2008

Mr. Dave Mohlenbrok
Senior Planner - City of Rocklin
Community Development Department, Planning Division
3970 Rocklin Road
Rocklin, CA 95677

Subject: Notice of Preparation (NOP) of a Draft Environmental Impact Report for Rocklin Commons Project (Project)

Dear Mr. Mohlenbrok:

The South Placer Wastewater Authority (SPWA) appreciates the opportunity to comment on the subject NOP. The SPWA is a joint powers authority formed to fund regional wastewater and recycled water facilities in southwestern Placer County for three partner agencies (the "participants"): the City of Roseville, the South Placer Municipal Utility District (SPMUD), and portions of Placer County. The regional facilities funded by the SPWA thus far include recycled water facilities, trunk sewer lines, and two wastewater treatment plants (WWTPs). All three participants transmit wastewater to these WWTPs. SPWA also monitors compliance with operational criteria established in the Funding and Operations Agreements among the participants.

The Funding Agreement outlines each participant's responsibility for debt service on SPWA's bonds and funding of regional facilities. The Operations Agreement documents maintenance and operations responsibilities for regional facilities (primarily the wastewater treatment plants) and establishes the City of Roseville as the owner and operator of the two WWTPs on behalf of the participants.

The Operations Agreement also identifies a regional service area boundary which delineates the area served by SPWA-funded regional facilities. Projects that require wastewater treatment using SPWA-funded regional facilities – especially projects outside the existing service area boundary – require appropriate environmental analyses. The SPWA Board considers the adequacy of the environmental documentation for such projects to ensure that regional facilities needs are met. Once that review has occurred, the participants may agree to modify the service area boundary identified in the Operations Agreement.

To project future regional wastewater needs, SPWA prepared the *South Placer Regional Wastewater and Recycled Water Systems Evaluation Project Report* (Systems Evaluation Report) dated June 2007. This report, and report updates, can be found on the City's website at: http://www.roseville.ca.us/eu/wastewater_utility/south_placer_wastewater_systems_evaluation.asp.

This report documents the wastewater facilities needs for the "2005 Service Area Boundary" (SAB) and provides the necessary technical information to analyze projects under CEQA. The information includes engineering evaluations for regional trunk sewer, recycled water, and treatment facilities which were based on the City of Rocklin's General Plan (1991) for areas inside the 2005 SAB.

For the SPWA Board to consider the impact of the Project on wastewater treatment capacity, treatment conveyance, and funding, we request that the environmental impact report (EIR) for the Update include the following:

1. Clearly document and depict the Project boundaries as they relate to the 2005 SAB shown in the Systems Evaluation Report.
2. For all parcels inside the 2005 SAB on which the zoning remains unchanged, the Update and EIR should rely on the 1996 Master Plan and Master Plan EIR, and build on that documentation using information in the Systems Evaluation Report. For purposes of evaluating wastewater conveyance, this may require your project to upsize Roseville-owned trunk sewers that collect wastewater flow from SPMUD trunk sewers and convey it through Roseville.
3. For all parcels inside the 2005 SAB and for which the proposed Project zoning increases the projected wastewater generation above the flow included in the Systems Evaluation Report, the Update and EIR should analyze the impacts and necessary mitigation measures, to the level of detail consistent with, and appropriate for, SPWA to use when expanding the wastewater treatment plants in the future. Again, for purposes of evaluating wastewater conveyance, this may require your project to upsize Roseville-owned trunk sewers that collect wastewater flow from SPMUD trunk sewers and convey it through Roseville. Attachment A provides specific guidance on the preparation of the CEQA document.
4. For all parcels outside the 2005 SAB, identify issues relating to the construction and installation of wastewater collection and conveyance facilities, and treated wastewater discharges that could result in, or contribute to, exceeding currently permitted wastewater capacity and/or discharge limits. To the extent that the Systems Evaluation Report can provide the basis for the needed technical evaluation, please feel free to use it. Emphasis also must be placed on cumulative impacts. Again, Attachment A provides specific guidance on the preparation of the CEQA document.

Please do not hesitate to contact us if you have any further questions.

Sincerely,



Derrick Whitehead
Executive Director

cc: Art O'Brien/City of Roseville
Mark Morse/City of Roseville
Charlie Clark/SPMUD
Jim Durfee/Placer County

ATTACHMENT A

GUIDANCE FOR ENVIRONMENTAL AND TECHNICAL ANALYSES

Background

The City of Roseville (City), the South Placer Municipal Utility District (District), and the County of Placer (County) entered into a Joint Powers Agreement (JPA) and formed the South Placer Wastewater Authority (SPWA) in October 2000. The SPWA was created for the purposes of, among other duties, funding and financing of Regional Wastewater Facilities. The SPWA and the Participants (City, District, and County) entered into a Funding Agreement and an Operations Agreement. The Funding Agreement established the revenue, debt service, and flow obligations among the Participants. The Operations Agreement recognized the City's role in owning, operating, and maintaining the Regional Wastewater Facilities.

The 1996 *Roseville Regional Wastewater Treatment Service Area Master Plan EIR* (WWMP EIR) was certified by the City of Roseville in November 1996 and was considered by the SPWA in October 2000 as part of the formation of the JPA. The Master Plan identifies the wastewater service area and contains the assumptions used to identify and design for wastewater conveyance and treatment facilities. Wastewater service within the current service area is based on a first come, first served basis, as outlined in the Funding Agreement.

The above agreements outline responsibilities and approval authorities among SPWA Participants relating to CEQA. The purpose of this document is to provide SPWA Participants and local agencies that prepare CEQA documents with the process and scoping guidance they will need to ensure adequate CEQA analysis is prepared for discretionary approvals of projects impacting Regional Wastewater Facilities .

For the purpose of this guidance document, Urban Growth Areas (UGAs) are defined as areas located wholly or partially outside the current service area.

Densification/Intensification projects (D/I Projects) are defined as areas located within the current service area where proposed zone changes would result in an increase in wastewater generation compared to the assumptions in the WWMP EIR.

Process for SPWA and Participant Involvement in UGA and/or D/I Projects

When local agencies with land use authority propose new UGAs or D/I Projects, it is appropriate for the local jurisdiction to consult with SPWA and Participant staff to ensure a comprehensive analysis of related wastewater impacts, including appropriate CEQA documentation. This effort should proceed in two phases and be based on the most recent available information as discussed below.

Phase 1: Early Consultation. The first phase should involve early consultation between the Lead Agency, SPWA, and Participant staff. The goal of early consultation is to

identify and agree upon the project's wastewater treatment and recycled water demands, parameters for cumulative flow analysis, and potential impacts to conveyance and treatment facilities. This effort should rely on the technical analyses contained in the *Regional Wastewater and Recycled Water Systems Evaluation* Report, which can be reviewed at the City of Roseville's website at:

http://www.roseville.ca.us/eu/wastewater_utility/south_placer_wastewater_systems_evaluation.asp. Once agreement is reached on project generated wastewater, and related conveyance, treatment and storage requirements, system upgrades necessary to accommodate the project can be identified.

Phase 2: CEQA Documentation. Phase two of the consultation process focuses on CEQA documentation. During this phase, upgrades to the wastewater system identified during Phase 1 would be incorporated in the CEQA document prepared by the local lead agency. It is recommended that any new or modified Regional Wastewater Facilities identified during Phase 1, as needed to serve the UGA or D/I Project, be incorporated into CEQA document project description and identified as off-site improvements. The related CEQA analysis should address construction and operation of these facilities at a "project-level" so that no subsequent or supplemental CEQA review is required.

This phased process helps to ensure that CEQA documentation will be adequate for any and all discretionary actions as discussed below.

CEQA Responsibility and Approval Authority Among Local Agencies with Land Use Authority, the SPWA, and the Participants

As discussed above, the CEQA process for UGA and/or D/I Projects is initiated by the local jurisdiction with land use authority. This could include any of the following agencies that receive sewer service from the SPWA: Placer County, the City of Roseville, the City of Rocklin, and the Town of Loomis. These agencies are collectively referred to as "local Lead Agencies."

Local Lead Agencies. Local Lead Agencies are the first agency to take discretionary action relating to the approval of a proposed UGA and/or D/I Project. As a result, they are the **CEQA Lead Agency** and are responsible for preparation of the first tier CEQA document for the UGA or D/I Project.

Local Lead Agencies should carefully follow the guidance provided herein to ensure the CEQA documentation for wastewater issues is adequate for all future related discretionary actions on the project. To ensure proper coordination, distribution of the CEQA Notice of Preparation (NOP) and/or any early consultation materials initiated or distributed by the local Lead Agency in accordance with CEQA Guidelines Section 15063 (g), shall include the SPWA and SPWA Participants. This coordination is extremely important to ensure that the local Lead Agency CEQA document is adequate for any future SPWA and Participant discretionary actions subject to CEQA necessary to

support the project. It is also important to ensure that the most current cumulative wastewater flow scenario is used for related analyses (to be provided by the SPWA as discussed below).

Since the UGAs and D/I Projects will generate wastewater flow and may require recycled water supply, capital facilities (e.g. wastewater treatment plants) will need to be modified, expanded, or constructed to accommodate the UGAs and possibly D/I Projects. Impacts from new or modified capital facilities that are required to serve new UGAs or D/I Projects, including any increased discharge of treated wastewater to the creeks, must be analyzed in the CEQA documentation prepared for the UGA or D/I Project.

The SPWA. The SPWA serves as a funding and financing authority for the construction of Regional Wastewater Facilities. In doing so, the SPWA acts as a **CEQA Responsible Agency**. As a Responsible Agency, the SPWA relies on the UGA or D/I Project CEQA documentation prepared by local Lead Agencies when taking discretionary actions related to funding or financing. The SPWA does not act as a Lead Agency.

In the capacity of a Responsible Agency, the SPWA will respond to CEQA notices for early consultation, including NOPs or other similar consultation requests, and will comment, as appropriate, to ensure the local Lead Agency's CEQA document includes the proper scope and analysis for wastewater issues. This includes providing the local Lead Agency with the most current assumptions for wastewater cumulative analysis. The SPWA will similarly comment on draft CEQA documents, as necessary, to ensure that the documentation is adequate to support any discretionary actions by the SPWA, including but not limited to future funding or financing discretionary actions, or modifications to the Funding and Operations Agreements.

The City of Roseville. The City of Roseville owns and operates the Regional Wastewater Facilities on behalf of the Participants. In this capacity, the City maintains the necessary permits to process and discharge treated wastewater (i.e., NPDES permits from the Regional Water Quality Control Board), and approves the design and carries out construction of any new or expanded Regional Wastewater Facilities. This includes approvals such as construction documents, bid authorizations, and the award of construction contracts. In this role, the City acts as a **CEQA Lead Agency**. However, when taking discretionary actions related to Regional Wastewater Facilities, the City relies on the UGA or D/I Project CEQA document prepared by the local Lead Agency. As such, the City of Roseville needs to review UGA and/or D/I Project NOPs or other similar consultation requests issued by local Lead Agencies to ensure the CEQA document includes the appropriate scope and "project-level" analysis of Regional Wastewater Facilities. The City of Roseville will similarly comment on the draft CEQA document to ensure that the documentation is adequate to support any discretionary actions by the City, including but not limited to construction and operation-related approvals, and modifications to the Funding and Operations Agreements.

The City of Roseville relies on the SPWA, acting as a CEQA Responsible Agency, for related construction financing approvals.

Other SPWA and Participant Approvals needed for UGA Projects. For those UGAs located outside (in whole or in part) the current regional service area boundary, it is important to recognize that the service area boundary is only modified by agreement of the SPWA and the Participants. It is, therefore, paramount that CEQA documentation for UGAs and D/I Projects be adequate to support discretionary actions by the SPWA and the Participants to modify, if necessary, the Funding and Operations Agreements to include land area outside the current service area or flows beyond those assumed at the formation of the SPWA, and as documented in the WWMP EIR. As such, Participant agencies should also review UGA or D/I Project NOPs, or other similar consultation requests issued by local Lead Agencies, to ensure the proposed scope and analysis for CEQA documents will be adequate for this future action. Participant agencies will similarly comment on the draft CEQA document to ensure that it is adequate to support future discretionary actions.

Guidance to Ensure Adequate CEQA Review by Local Lead Agencies

The following is intended to assist local Lead Agencies when determining the proper scope and analysis for CEQA documentation of UGA and D/I Project wastewater issues.

Wastewater Issues of Concern. In general, the following conditions create CEQA issues of concern for the SPWA, the City of Roseville, and the Participants when fulfilling their future CEQA responsibilities related to their approval authorities discussed above:

- The creation of conditions that may exceed the capacity of Regional Wastewater Facilities;
- The creation of conditions that may exceed the wastewater quantity analyzed or certified in the WWMP EIR;
- Installation of new Regional Wastewater Facilities;
- Expansion of existing Regional Wastewater Facilities, including conveyance infrastructure;
- Modifications of approved SPWA service area boundaries; and
- The creation of conditions that exceed permitted discharges from the Regional Wastewater Treatment Plants or exceed the ability to handle offsite disposal or reuse of biosolids.

The Scope of CEQA Analysis. In order for the CEQA document prepared for a UGA and/or D/I Project to be complete and adequate for use by subsequent SPWA and Participant agencies as discussed above, it must contain project-level analyses of the following, at a minimum:

- Construction and Operation of new wastewater collection and conveyance facilities;
- Alteration of the quality and/or quantity of discharges from wastewater treatment facilities beyond discharge levels permitted under the current NPDES discharge permits, and production of biosolids needing offsite disposal and/or reuse in excess of current permitted capacity;

- Construction and operation of additional wastewater treatment facilities required to serve the proposed UGA or D/I Project (beyond those considered in current documents);
- Delineation of areas in each UGA that are outside the current service area boundary and documentation of wastewater flow and recycled water demands in quantities greater than what is included in the WWMP EIR or reallocation of wastewater flow and recycled water demands as compared to those shown in the WWMP EIR or more current documents;
- Inducing growth as a result of removing obstacles to growth;
- Potential cumulative effects associated with other past, present, or foreseeable future projects;
- Alternatives analysis for each of the systems (wastewater collection, treatment, disposal, and recycled water storage and distribution) listed above.

Mitigation Measures for Significant Adverse Impacts. It is expected that CEQA documents prepared by local Lead Agencies will identify and provide project-level CEQA analysis for all Regional Wastewater Facilities necessary to implement the UGA or D/I Project. Local Lead Agency CEQA documents prepared for UGA and D/I Projects may not include mitigation that defers to a future date analysis of the construction and operation of required Regional Wastewater Facilities. Project-level analysis of these facilities is required in the local Lead Agency CEQA document in order to fulfill the other related SPWA and Participant CEQA actions as discussed in this guidance document.

Although no deferred wastewater mitigation should be included in local Lead Agency CEQA documents, it is possible that mitigation may be required to ensure that required Regional Wastewater Facilities are permitted, constructed, and operational prior to their need. Although the City of Roseville would serve as applicant for any required modification to Regional Water Quality Control Board waste discharge permits, the local Lead Agency needs to ensure through CEQA mitigation that building permits for related UGA and/or D/I Projects are withheld until all required permit modifications are secured and financing for Regional Wastewater Facilities has been approved by the SPWA.