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The BO continues with the resulting impacts on rising water temperatures and the lethal damages to the natural cycles that have evolved over thousands of years.

Thus, to not increase the required buffer to 75 feet or more AND to encroach within the 50 feet buffer is to violate the GP and ignore both the NOAA and F&G recommendations. **Please explain how the proposed project will comply with the GP designation that buffer areas be designated greater than 50 feet, especially in light of public agency recommendations.**

43-164

There are numerous GP statements that give support to the City's obvious preservation intentions from the GP's SUMMARY pages 8, 9 & 10, (II, B., Policies 1, 2, 3, 4, 6, 15, 18, and 19), as well as other open space policies stated in GP's GENERAL PLAN ELEMENTS pages 59 through 63.

However, page 58, under "Future Open Space, Conservation, and Recreation, the City's commitment to protecting open space and resource conservation designations is reiterated, and followed by this statement: "Areas meeting these criteria but not specifically designated as open space, conservation or recreation shall also be protected from adjacent development."

Placer County's Resource Agency's NOP comment letter (October 14, 2005) also indicates a question regarding the sufficiency of only a 50 feet setback from the creek. **Please insist on compliance with the stated and the intended General Plan policies and statements. Please require minimum 75 feet setbacks in flatter, open areas, and, in Clover Valley's unique steep narrow slope areas, require greater 100 to 200' setbacks.**

43-165

Although the topic of 4.8 I-5 included the words "seasonal wetland habitat," it was not discussed in this section at all. We are given a hint that the loss of the seasonal wetlands will be close to 12 acres and that it will be due all or in part to the location and operation of the detention basins. We are not given information as to exactly where the detention basins will be located (reference to two roadway creek crossings is vague—"Final alignment of the creek crossings and construction techniques shall be implanted as required by [listed agencies]"-page 4.8-34 and "Once the location of any creek crossing is determined," -page 4.8-35); thus we cannot analyze the impacts to the loss of the seasonal wetlands.

However, Vol II, Apendix I, Biological, ECORP, page 25 does mention seasonal wetland removal in Impact 4, "Impact to Wildlife Habitat" which is correctly described as significant. Wetlands prevent floods, cleanse waters, and recharge ground-water aquifers. They retain nutrients and other pollutants which are then incorporated into the wetland biomass. Wetlands are also ecological assets due to their provision of habitat for waterfowl, animals, and vegetation. **However the DEIR omits any review of the seasonal wetland loss impacts, how or where they will occur, and the relationship to the detention basins. Please provide seasonal wetland loss information, analyze the impacts, and provide meaningful mitigation measures. Please recirculate the Draft EIR for public review of this issue.**

43-166

Some significant impacts to seasonal wetlands are discussed on page 4.8-35, 4.8 I-8, "Long-term operational impacts to riparian and aquatic habitat," but they are not the impact being analyzed or mitigated. In addition, the discussion omits the impacts from grading that will occur within the seasonal wetlands to create the detention basins.

The Placer County Dept of Public Works NOP letter (October 8, 2002) specifically expresses concerns about, and asks for a discussion of, sedimentation impacts

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on the capacity of the proposed detention basins within a creek. Although not required, the omission of this critical discussion is germane to any rigorous review of the proposed **Please address all impacts to seasonal wetlands and recirculate the EIR for public review.**

43-167

Detention Basins. We cannot find a meaningful environmental analysis of the impacts on the seasonal wetlands of the two proposed detention basins in this DEIR, yet the basins form the mitigation measures for a number of significant impacts. Flooding occurs now; and we know the proposed development WILL increase flood potential with the increased impervious surfaces (especially with the planned grading of half the 622 acres).

Volume II, Appendix O, West Yost & Associates (WAY) discusses the detention basins in terms of functioning, but not in terms of critical impacts of the detention basins themselves upon the wetlands, prehistoric sites, and wildlife habitat.

43-168

Page 4.8-33, 4.8-1-6. In the discussion of grassland conversion, it is noted that the grasslands of Clover Valley are unique due to the isolated nature of the area and connectivity to large undeveloped areas. The impact of the loss of wildlife habitat due to elimination of cover and prey base of many wildlife species is designated as significant and unavoidable. **No MM are suggested, but impact fees should be discussed as reasonable MM, along with off-site 1:1 replacement.**

We submit that a realignment of the proposed project and/or more consideration of the alternatives with reduced total number of residential units, with clustering solely at the extreme north and south ends of the property, would eliminate roads and much of the grassland conversion significant impacts. Please consider this proposal.

43-169

Page 4.8-35 MM-7. The sixth bulleted item is inadequate as a MM due to the extreme significance of the impacts as described in the ECORP report, pages 26 thru 29 and the specific monitoring procedure presented. Although the contractor must be charged with keeping records of the monitoring, no mention is made of action to take if erosion and sediment control measures are breached. The ECORP recommendation is, "The RWQCB would inspect the project site over the construction period and at unspecified intervals after project completion, until the site is fully revegetated....two or three years following the cessation of construction." Although this suggests an impartial inspection/monitoring process, we do not know if the RWQCB has agreed to the imposed obligation. Also, neither the MM nor the ECORP recommendation specifies penalties for noncompliance. **Please tighten the MM and provide the information for public review.**

43-170

Page 4.8-47, MM-11(a)—VELB. Although it is stated that the conservation area shall be managed and monitored in perpetuity as outlined in the Beetle Conservation Guidelines, it then includes management and monitoring of the conservation area for either ten (10) consecutive years or seven (7) years over a 15-year period. **This appears to be an inconsistency (perpetuity or 10 or 7 years). Please explain.**

43-171

Page 4.8-53, I-15: The DEIR claims that the barriers and impoundments present in Clover Valley Creek downstream from the project do, and would, preclude both steelhead and salmon use, AND this precludes designation of upstream habitat as critical habit for steelhead as determined by NMFS.

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- 43-171 The barriers and blockages can be easily remedied. Throughout the Dry Creek Watershed, of which Clover Valley Creek is a part, creeks are being restored, and major blockages are being removed (Hayer Dam removal on Dry Creek is an example). With relatively minor restoration effort, Clover Valley Creek could contain both salmon and steelhead. As stated in the 2002 NOAA BO:
 “The creek is considered restorable because the ‘problem culvert’ could be easily replaced and full passage restored. Overall, the action area was likely suitable for opportunistic use....Such drainages have historically contributed to continued survival of steelhead, ... Within the project site itself Clover Valley Creek meanders and connects with large areas of wetlands which function to protect water quality and dissipate storm flows, which also would contribute to habitat quality for steelhead.” (page 10)
 However, with encroachment, culverts, sediment loads and toxic pollutants, the restoration possibilities are diminished. It is fairly common knowledge that protection is more cost effective than restoration. **Please recirculate a new EIR and include an analysis of the impacts to Clover Valley Creek and downstream Dry Creek Watershed (critical habitat) with the constraints removed, as they eventually most likely will be.**
- 43-172 The ECORP conclusion as to Clover Valley’s designation as critical habitat may not be consistent with current rules and regulations as cited in a more recent “Federal Register/Vol 70, No. 170/Friday, September 2, 2005/Rules and Regulations 52519-52523” (Attachment 2). The ECORP report references a Taylor Hopper letter from June 19, 2002; however the conclusions discussed in that letter (vacating the critical habitat regulations) were updated in the 2005 Federal Register (see above reference). Thus, the project site may INDEED be critical habitat for the steelhead and if so, this should be reflected in the both impacts and MM in this DEIR. **Please conduct a review of the latest NOAA critical habitat designation criteria as well as a review of the latest NOAA listed species. More importantly, please review NOAA’s definition of “Take,” to ensure the project will not harm, harass, kill, injure, etc., and of the species down stream.**
- 43-173 The Federal Register (FR) citation states: Section 3 of the ESA (16 U.S.C. 1532(5)) defines critical habitat as “... (ii) specific areas outside the geographical area occupied by the species at the time it is listed upon a determination by the Secretary that such areas are essential for the conservation of the species.”
 The information in the Federal Register referenced states “Pursuant to our regulations, when designating critical habitat we consider the following requirements of the species... (5) habitats that are protected from disturbance or are representative of the historical geographical and ecological distribution of the species...”
 To not address impacts simply because barriers exist that can be, and very likely will be, removed is to jeopardize the fishery’s future, the preservation of sensitive special-status species, and violates the GP Open Space Policy that encourages protection of natural resources areas. To minimize MM based on faulty information is to destroy future opportunities to have salmon and steelhead returning year after year in Clover Valley Creek, which, according to 1964 Fall-Run Chinook Spawning Survey by Eric Gerstung, was the condition of both Clover Valley Creek and Antelope Creek (from Placer County web page: <http://www.placer.ca.gov/planning/legacy/streams-lit-review/antelope-creek.pdf>, page 8, with Fish and Game documentation on page 9, citing a

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10/19/64 letter). **Thus, this impact must be addressed and should be considered significant.**

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Please consult with NOAA Fisheries and determine the latest terms and conditions to minimize incidental take of Central Valley steelhead and EFH of fall-run Chinook in the Dry Creek watershed. Please use NOAA Fisheries recommendation of 75 feet as the buffer. Raise the bar and follow the recommendations as they are intended for resource protection.

43-174

Page 4.8-55, MM-15(a): In dealing with impacts to special-status fish, this impact is diminished and presented almost in its entirety based on the “constraints in the CV Creek Channel downstream of the project” and ECORP’s conclusions that “the portion of CV Creek in the project area is not considered as migratory habitat for state and federally listed fish species.” All of the constraints are easily remedied and removable. When the creek fish passages are restored, the proposed project’s culverts will become the constraints. **For comment discussion on this DEIR, ALL creek crossings created from this proposed project need to be designed as free spans and NOT utilize culverts.** The debris and sediment buildup associated with the use of culverts (as well as erosion around the culverts) will further impede fish migration possibilities. Although NOAA apparently has described “bottomless arches sized to accommodate the active channel width...” we do not see a firm commitment of the project creek crossings to follow those guidelines. **Please require creek crossings with bottomless arches or free spans to accommodate the entire channel width.** An example of such a span can be viewed in Roseville, Calif., off Blue Oaks Blvd in the Diamond Creek subdivision on Parkside Way (just south of Bridge Side Ct) on the creek crossing.

43-175

Because there are a relatively small number of impediments, barriers, and/or blockages that prevent anadromous fish from reaching Clover Valley Creek as it passes through the proposed project, consideration must be given to future unimpeded fish passage. Current non-profit organizations as well as regulatory and public resource agencies are actively involved in creek restoration in the Dry Creek Watershed. As the NOAA BO suggests, the applicants should replace the downstream barriers to migration. As a MM measure, please consider requiring the restoration of all fish passage impediments, barriers, or blockages from the confluence of Clover Valley Creek and Antelope Creek upstream through the proposed Clover Valley project to allow fish passages to return to historical levels.

43-176

Under “Other Impoundments,” the DEIR states, “In addition, the U.S. Army Corps of Engineers permit issued for the construction in-and-around the streams indicates that the project would have no effect on fisheries.” (page 4.8-54) In a phone call to the Corps on March 2, 2006, at approximately 1:35pm, Mr. Tom Cavanaugh stated that he did not know what kind of a permit was being referenced, and furthermore, the Corps does not make analysis or statements regarding effects on fisheries. **How is the referenced permit identified by the Corps? When was it issued? When does it expire? Why isn’t it listed as a resource, and how can the public obtain a copy? Please conduct a new EIR and make this information available for public review.**

43-177

Page 4.8, page 55, MM-15(b): First bullet item: The MM relies on a what appears to be a directive to the Corps to ensure minimal impacts and ensure maintenance

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in perpetuity of the Vortechincs filtration system. (1) The MM must come from the applicant and not direct a public agency to perform; (2) NOAA's BO specifically states

"The project proposes to use Vortechincs storm water filters to filter storm flows up to a two-year event. The filters remove fine sand and coarse particles of approximately 60 mm and larger which indicates silt (less than 60 mm) would be able to pass through the filters. Silt entering the creek would flow downstream and may settle in Antelope Creek or Secret Ravine which are the main spawning and rearing areas for steelhead in the Dry Creek watershed... [which] could impact spawning gravels... reducing gravel permeability and potentially smothering eggs and decreasing the amount of already limited available spawning habitat. These downstream areas are currently impacted by excessive sedimentation and any additional input could have deleterious effects on habitat quality ... effectively reducing the amount of possible salmonid production."
(page 10)

Please explain how this MM measure which obligates the Corps and uses a system that will not adequately protect downstream habitat can possibly be construed as appropriate and adequate. Please explain who will fund the maintenance in perpetuity. Please describe how enforcement and non-compliance issues will be handled and penalties established.

43-179

Second bulleted item: **Please explain how creating a report by taking photos, describing measures, and developing a reference library is a MM for an impact that could destroy fish migration in a viable watershed. Please explain the relevance of those activities and the lessening of an impact?**

43-180

Third bulleted item: Water quality monitored as a baseline is inappropriate since the baseline may already be compromised at the time it is measured. If the baseline measurement does not indicate high water quality, as would be expected with a tributary at the upper end of the watershed, then those "problems" must be dealt with first. A less-than-acceptable water quality baseline will mean that additional impacts will simply compound the problems down stream (cumulative impact). The baseline water quality must be at an acceptable, healthy stream level, including sediment and invertebrate conditions.

What is to prevent an unacceptable water quality level being considered the baseline? What levels of water quality must be met to "ensure the filtration systems are functioning properly. NOAA must approve the final design of the monitoring plan but this is not a MM. What is the monitoring plan? How often will monitoring occur; what standards will be used? Who will fund it? Please explain how this MM will prevent the incremental degradation of water quality in Clover Valley Creek. Please provide this information to the public for review.

43-181

Vol II, Appendix I, ECORP report, page 31, states that the prior impact analysis focused on a small number of species. This is followed with, "All species identified in ECORP's updated species list should be addressed." The report contains a narrative "list" of species and "Appendix A" list with potential to occur in Clover Valley, but does not indicate how or if they were "addressed." Vol I contains an incomplete copy of the narrative list (omitting the Burrowing owl and the California thrasher), but also does not indicate how, or if, they were addressed. **Please conduct proper, agency approved protocol to study all potentially occurring species appropriately and adequately.**

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4.9 GEOLOGY.

- 43-182 Page 4.9-5—Typographical error? Surely those materials are all **prohibited**.
- 43-183 Page 4.9-2, 4.9-6. In referencing the natural slopes, the range is given as “30 percent or less, although some isolated slopes have gradients of up to 50 percent or more.” Page 4.9-10 MM-1(a) discusses lots with 15 to 30 percent slopes needing engineering. No mention is made of the Rocklin General Plan requirements for lots of 20% slope or more and concern for building on steep slopes. **Please include the GP policies in discussion of slopes in excess of 20% and required approvals.**
- 43-184 Page 4.9-11, MM-1(b): Reference is made to an “Improvement Plan.” **What is this plan, and where can it be found? Please provide the Plan to the public for review.**
- 43-185

Page 4.9-8. It is stated that because nearly 20,000 cubic yards of excess fill will be created, the potential for soil stockpiles exists. On page 3-15 we are told that the goal of the project applicant is to have the cut and fill balance on-site. We are further informed of the City’s concern via correspondence between Stantec in answer to the City’s Completeness Letter of 7-21-05, Item No. 11 (page 3), where the City states, “The proposed application materials need to identify anticipated stock pile locations including estimated heights, the acreage of land area expected to be occupied, and estimates regarding the anticipated duration of material storage.” The Response is that the project proponents want to move forward in a single phase and that an exhibit is included illustrating requirements to balance the project.

Thus, we are given one “balanced” scenario in section 3 of the DEIR; we find the question glossed over in the completeness letter; and on page 4.9-8, we find an excess of nearly 20,000 cubic yards. **Where will it be stored? How high will it be? How long will it be there? What are the impacts?**
- 43-186

Page 4.9-14, I-4—Impacts related to groundwater seepage.

The DEIR refers to “seeps” observed on the site, and how changes in grade could expose them to necessitate dewatering. The problem is dismissed as not extensive. However, the Kleinfelder report (page 6) reports “significant seepage was encountered in our valley floor test pits at depths of about 4 to 12 feet...” The WKA study about three years later reports (page 5) “...high volume of surface water that flowed into the test pits as they were excavated...” Further WKA observations describe the seepage in other test pits outside of the flood plain. But most importantly, the WKA report states (page 6) that “Springs are known to be active at the site during certain times of the year, and are typically located on the hillsides.” The conclusions in the WKA report are that the soils at the proposed street creek crossings are not suitable to support the proposed bridges.

With this, the DEIR impact is designated “potentially significant.” How can soils that won’t support the creek crossings be designated only potentially significant? **It should be significant.** The MM-5 (page 4.9-14) refers to the “Improvement Plans” (which, as noted above, is not available) and suggests approval of a soil investigation , that in turn shall result in appropriate roadway construction and foundation techniques. This MM is a plan based on a yet non-existent soil investigation. We do not know how much of an impact will actually occur with the building of the roads and foundations which is critical to a meaningful review. Technically, this type of MM could result in greater cuts and fills, significant creek impacts, and other environmental degradation.

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The very fact that Rocklin has a known spring nearby suggests significant ground water and seepage impacts. **Please provide much more information as to the impacts that can occur in the effort to build solid building surfaces and mitigate appropriately. Even if there is a disregard for environmental impacts, please provide the information from a human safety aspect concerning the creek crossings for public review.**

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43-187

Page 4.9-17 mentions disturbance to the natural drainage swales (concern of which is referenced elsewhere in this comment letter) and vegetation. Further erosion impacts are described, difficulty of revegetation to control erosion, as well as concentrated flows from cut and fill slopes. With all of the impacts described, the DEIR takes off on a tangent to mention the temporary excess of almost 20,000 cubic yards that will remain on site temporarily, resulting in a potentially significant impact. Surely, after such a discussion of impacts, the focus should not be reduced to the potentially significant impacts of the temporary storage of the cut. Yes, the temporary storage may indeed be potentially significant (and we want them mitigated as indicated above), but the erosion impacts described are quite significant yet ignored. The MM changes course, like an eroded channel, and states that another MM described in Hydrology will reduce the magnitude of the soil erosion impacts to less-than-significant level.

Page 4.9-17, MM-7. To submit for review an Erosion Control Plan is not a MM. **Please submit a MM that describes an activity that we can review.**

43-188

The WKA letter, Appendix L, page 13, refers to slopes steeper than 6:1 (which is true for a great deal, if not most, of the project's sloping landscape). In describing the benches, it is stated that each bench should consist of a level terrace excavated horizontally at least four feet into the hillside. Benching should be done progressively up the hillside at vertical increments not exceeding two feet. However, in Sheet RP-8, page 4.9-9, not only are the benches not level (they are sloped at proposed 2:1 maximum), but also the benches are at a maximum 12' height. **Please explain these discrepancies and if corrections are necessary, please provide new visual elevations for public review.**

43-189

The WKA letter, continuing on page 19, states that excavation on slopes may expose springs or seeps, but that "Identification... may not be possible until several months (or years) after grading operations are complete." Prior to this paragraph, it is stated that an accurate prediction of overall shrinkage factors for earthwork is not possible. **With all the unknowns, coupled with the fragility of the ecosystem being impacted, adequate impacts have not been identified, evaluated or mitigated. Please do so and allow the public to review.**

Section 4.10—Hazards

43-190

According to the supporting document Appendix M, Hazards, Volume II, the Phase I Environmental Site Assessment for the proposed project was to evaluate "...for evidence of potential soil and ground water contaminations resulting from current and/or former site activities." As stated, the work was authorized March 6, 2001 (Wallace-Kuhl & Associates, Inc., [WKA] No. 3799.02, page 1) and "...on observations made only on the date of our field reconnaissance, March 19, 2001." (WKA, No. 3799.02 page 22)

Although one would not expect major changes in the scope of the section on "Hazards" (past uses, wildland fires, on-site mines), nor would one question the

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↑ credentials of WKA, one would expect that in five years greater understanding and technological advances in evaluating hazards surely must have evolved. Thus, it would be reasonable to conclude that a five-year old , one-day evaluation could be considered obsolete.

With the relative large scope of this proposed project, why wasn't a more recent site evaluation conducted? Were the entire 622 acres visited in one day?

43-191

WKA's correspondence states that in that one-day site reconnaissance, the on-site tenant and the adjacent rancher were interviewed. Page 4.10-13 also cites the neighbor as a source of the historical evidence. As stated, these anecdotal narratives may meet ASTM interview standards; however, with the importance of a proposed 558-unit development, one would expect a more comprehensive assessment of the potential and real on-site hazards. **Why wasn't the All Appropriate Inquiries Rule (AAI) standard used for the inquiry? What were the qualifications of the interviewer?**

43-192

It is common knowledge that almost the entire 622 acres in Clover Valley have supported livestock, and prior to that, orchard activities. Because of these known activities, at a minimum, a soil sampling and analysis program for organochlorine pesticides (i.e. DDT and toxaphene) should be conducted. Because of known orchard activities, tests should also be conducted for arsenic and lead.

Prior to implementation, the soil sampling and analysis program should be approved by a toxicologist from the Cal-EPA, Office of Environmental Health Hazard Assessment (OEHHA). The soil sampling results should be submitted to the Cal-EPA, Department of Toxic Substances Control (DTSC), to determine whether detected concentrations of the all sampled substances fall within acceptable health risk guidelines. If they do not, to the fullest degree necessary, measures must be implemented to ensure the safety of human health by removing, or treating to zero levels, any contaminated soils. **Why weren't soil samples tested and results made available?**

43-193

In their NOP letter (October 12, 2002), Placer County's Environmental Health recommended at a minimum specific Environmental Site Assessment along with further studies if warranted. **Please require such minimal assessments and more rigorous where indicated. Please provide the analysis, the impacts, and the MM for public review.**

43-194

Page 4.10-5—It is stated in a letter from WKA dated December 24, 2002 (which appears to be missing from both Volumes I and II of the R DEIR), using a 1.5 mile search radius around the project site, that no evidence of metal mining was found on the project site. This is unusual considering the fact that the Bickford Ranch development, located less than a mile from the project, found at least seven potential mining locations. Soil and water sampling and analysis must be conducted for human health and ecological risks. Even if chemical hazards introduced from mining activities are unlikely, at a minimum soil samples should be analyzed for toxic metals, arsenic, and other hazards that are known to occur in similar surroundings. **Will comprehensive, meaningful soil analysis be conducted to insure no hazards exist? Please provide the analysis, the impacts, and the MM for public review.**

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43-195

Page 4.10-5 to 4.10-7—Hazardous Building Materials, Storage Tanks, Wells

The inadequacy of the archived building permit records cannot be emphasized strongly enough, especially in determining the level of significance for the presence of asbestos or other materials, as well as the creation of septic systems, cisterns, wells, tanks, etc. Since the subject property was annexed to the City of Rocklin in 1997, one can only assume that the archive search should have been conducted with the County of Placer.

There are currently 13 parcels with Placer County APN numbers (although the project parcels numbers given for the most part are not valid); these, as well as indicators of roadways in the valley, are evidence of the possibility that more than one residence existed. According to members of the Loomis Basin Historical Society, there were more than two homes located on the subject property, all of which may have had excavations (in addition to potentially other known hazards—lead-based paints, asbestos, pesticide use, etc.). Also, accidental fire may have been the cause for the disappearance of the structures, and not planned demolition.

In addition to the caretaker's house (which was razed in 2004), there is an obvious underground excavated area east of the creek, just north of the unofficial creek crossing area. In the site assessment (Vol II, WKA No. 3799.02, page 10) under the "1954 Map, a reference is made to more residences. "Three dwellings are mapped on the northerly portion of the property, on the east side of the valley.... We observed the foundations of these structures during our field reconnaissance." **Why weren't the former residences referenced? Please determine the locations of all the former residences in the proposed project, find all underground excavations, and soil test for hazardous materials. Please provide the analysis, the impacts, and the MM for public review.**

43-196

The proximity to the project of the PCWA facilities is noted, however, insufficient reference is made to potential hazard from not only run off from chemicals used at that facility but also tank(s) rupture(s). Although not a common or predictable impact, tanks have been known to fail. **Please study the impacts of various levels of tank failure (rupture, collapse, etc.), identify and analyze the chemicals used and stored on the facility site. What is the significance of run off, spills, etc., to the valley and residences directly below in the event of such an occurrence? Please provide the analysis, the impacts, and the MM for public review.**

43-197

Page 4.10-7—Mosquitoes

With concerns of West Nile Virus, Western Equine Encephalitis and other mosquito borne illnesses to human beings, there is also concern of Canine Heartworm, transmitted by mosquitoes. Clover Valley's important wetlands can be mosquito breeding grounds, as well as the proposed detention basins. Standing water from these two project components as well as from the inevitable over-irrigated landscaped areas will significantly increase the mosquito population. These concerns are supported in both the Placer Mosquito Abatement District NOP letter of October 4, 2005, and the Placer County Environmental Health NOP letter of October 12, 2002.

Spraying for mosquitoes is dangerous and presents consequences possibly more damaging and long term than the risk of contracting the disease(s). Thousands of fish, birds and beneficial insects like butterflies and bees are killed by the spraying. Clover Valley Creek, the wetlands, and the proposed detention basins will contain the pyrethrums, which then kill or poison the bugs which the fish eat. Repeated spraying has severely impacted vital ecosystems, and the offspring of mosquitoes that survived the spray are now likely to be growing increasingly resistant to the pesticides applied.

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