

## Letter 161

City of Rocklin  
David Molenbrok, Senior Planner  
3970 Rocklin Road  
Rocklin, CA 95765

March 6, 2006

Re; CLOVER VALLEY CONCERNS

Dear Mr. Mohlenbrok:

In the deliberations and discussions regarding the permitting for the development of Clover Valley, please give consideration to the fact that both my wife and I strongly believe that the negative impact of increased traffic and related air pollution, will not be offset by any benefits that might accrue from the development of this beautiful area.

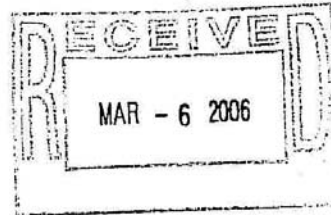
We are apposed to the development of Clover Valley!

We may be contacted if there is any need or benefit to do so.

Thank you.



Albert & Joanner Renner  
4347 Newland Heights Drive  
Rocklin, CA 95765  
(916) 315-3991



161-1

**LETTER 161: RENNER, ALBERT AND JOANNE**

**Response to Comment 161-1**

This letter expresses opposition to the project due to the traffic and air pollution impacts and does not address the adequacy of the DEIR.

**Letter 162**

Page 1 of 1

**David Mohlenbrok**

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**From:** Rockyfrio@aol.com  
**Sent:** Friday, March 03, 2006 2:11 PM  
**To:** David Mohlenbrok  
**Subject:** Clover Valley Project

Dear Sir:

162-1

I am writing as a concerned resident of Springfield. I chose to live here because I was impressed by the quiet streets and close proximity to shopping and medical centers. If Clover Valley is expanded, I believe this will have a great impact on the traffic it will generate. I am not in favor of this expansion.  
Thank you,  
R. Riofrio

03/03/2006

**LETTER 162: RIOFRIO, R.**

**Response to Comment 162-1**

This comment expresses opposition to the project due to the traffic impacts and does not address the adequacy of the DEIR.

Letter 163

2-18-06

Rocklin City Planning Dept.

My name is Karen Kutz  
and I am a relative new  
comer to the Rocklin area.

I recently drove down Park  
in Rocklin to the water  
works park in order to get a

glimpse of Clover Valley, to  
see what the issue was all  
about. The sight of this

beautiful, untouched green  
valley with the mountains  
in the distance was

breath-taking. Please save  
this piece of California for  
my grandchildren -- don't

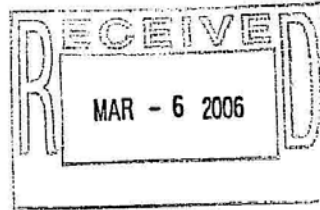
"take paradise and put up a  
parking lot!" Sincerely,  
Karen R. Kutz

163-1

**LETTER 163: RUTZ, KAREN R.**

**Response to Comment 163-1**

This letter expresses opposition to the project due to aesthetic characteristics of the site and does not address the adequacy of the DEIR.



Letter 164

6-Mar-06

Sherri Abbas  
Planning Services Manager  
3970 Rocklin Road  
Rocklin, CA 95677

RE: Project#: SD-98-05, Clover Valley Re-circulated Draft EIR Comments

Attached is a list of specific comments for the published EIR. In this letter are some overall comments and high level observations for each section. I have an extensive background in technical document review (24 years) and so I hope these comments bring to light some of the issues with this document. One thing I do know about document review is that for every two defects you find in a document there will probably be one that you did not see. Also, the process of revising a document will introduce additional defects that you must find after another review. In my opinion, this document contains numerous flaws and therefore is insufficient as a decision making guide. Clover Valley is a special place for many of us and we a higher quality document to guide our decision making process.

General:

164-1

**Impact Summary Terms** - The use of significant and potentially significant is not consistent in the document. In some sections significant is used when the impacts are known to be significant and potentially significant when the impact is not known but is anticipated to be significant (Biological section). Other sections use significant only if the impact cannot be mitigated and use potentially significant if the impact is significant and can be mitigated (Geology). A common definition should be used in all sections. I would recommend that the use of these terms be consistent with the Biological section. This makes the most logical sense since if mitigation measures are not performed or performed incorrectly then the impact is significant. Potentially significant should be reserved for those impacts that are either partially or totally unknown as this time and must assumed to be significant until proved otherwise. If this method were adopted then you add up the risk associated with potential impacts as compared with known impacts. As it stands now there is no easy way to assess the risk in this EIR.

164-2

**Lack of Evidence for Mitigation Measures:** There is an extreme lack of evidence for mitigation measures in the document. There is no data presented that the recommended mitigation measures have worked successfully in other similar projects. How does the reader know if these measures will actually reduce the impact? Will a bus stop in an upper middle class Rocklin neighborhood actually be used? If so, by how many people and how will the bus diesel exhaust output balance out with the reduced vehicle traffic. Will putting electrical outlets on the front and back of the house actually reduce operational pollution? How many people will take advantage of this feature? There are numerous items that discuss agreements and permits between various agencies that must be completed before start of construction. It was mentioned in the meeting that some of these mitigations having to do with Corp of Engineers involvement were not correct. The mitigation measures need a more thorough review.

164-3

**Mitigation Measures Masquerading as Incomplete Work:** There a numerous mitigation measures that appear to be masquerading as a holding place for incomplete work. This is especially present in the biological resources section of the document. These mitigation measures are characterized by statements like a study needs to be performed to find out some item of information. Without this information the impact cannot be correctly assessed. These studies must be completed and reviewed prior to the sign off of this EIR. This seems to be a major process hole.

164-4

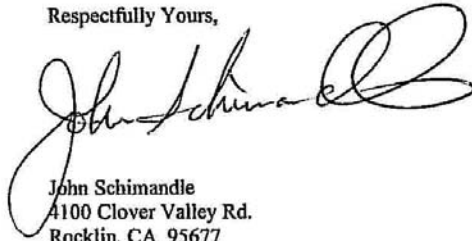
**Missing Adjacent Communities and use of Misleading Adjacent Communities:** The adjacent communities along the north and east of the valley are conspicuously left out in many of the sections. Each section must be analyzed for its impact to the existing bordering communities. Using the existing Rocklin communities in Whitney Ranch to the west is not an accurate comparison because these houses are not visible from Clover Valley nor are impacted by most of the effects of the development. Adjacent westerly communities would only be impacted by the traffic and air quality issues. The most pertinent neighboring community is the semi-rural land to the north and east and the existing Clover Valley subdivision to the south. The homes

- 164-4 Cont. ▲ on the western valley ridge that view upper Clover Valley were surely not purchased due to the fact that they would someday look out onto a valley full of high density housing.
- 164-5 NOP Comments Not Addressed: A large number of NOP comments were not addressed. I did not have time to figure out if the summary of NOP comments extracted from all 127 letters was even accurate. Based on the accuracy of the rest of the document there are probably some issues in translating the NOP comments into a summary of "pertinent" comments. I guess the definition of pertinent should probably be defined as well. What is pertinent to one person is not pertinent to another. How is pertinent defined by CEQA?
- Specific High Level Comments by Section:
- 164-6 Land Use:
- significant shift from low density to high density zoning (elimination of RD-1)
  - Land Use Policy 7 which is consistency with surrounding land is not being followed. Also Open Space Policy 20 is not being followed. Existing surrounding land is mainly zoned rural and agricultural.
- 164-7 Aesthetics:
- 164-8 • Current residences in the valley were not considered in the analysis
- 164-9 • No easterly facing photos
- 164-10 • Many references to current Rocklin developments as being consistent that are not even visible from this valley.
- 164-11 • No reference to view homes on the ridge that would be impacted
- 164-11 Air Quality:
- A large number of Mitigation Factors are really unbelievable. The effectiveness of these measures is not studied or presented in any way and the likelihood that some of them would work is very small.
- 164-12 • Page 4.5-4 states the area is classified as severe non-attainment for federal and non-attainment for state. Why would you build more houses? Attainment should be achieve in 1999, then 2005 and now pushed out to 2013. It just seems like the extensions keep coming and the whole time people are getting ill from the pollution. This is a huge public safety issue.
- 164-13 • Operational vehicle emissions mitigations were unbelievable. Using public transit, bicycles and car pooling. Really, in Rocklin?
- 164-14 • CCNR provisions must include additional items in the previous mitigation. Electric equipment, landscaping, pool solar heating must be mandated otherwise they will not be used.
- 164-15 Noise:
- Most of this section is a noise feasibility study for the potential residents of the proposed development. This should be removed. Should focus only on impacts to existing dvelopment.
- 164-16 Cultural and Paleontological Resources:
- Huge omissions in this section. There is no summary analysis of archaeological resources.
- 164-17 • Mitigation measures are not proven to be effective
- Some analysis and plans required by law are not complete
  - Faulty and misleading conclusion.
- 164-18 Biological Resources
- Many impacts are unknown and mitigation measures require surveys to gather more data. This data should be gathered and analyzed prior to EIR approval and not after.



- 164-19  Public Services and Utilities
- Water supply section is very confusing. Need graphical presentation of historical and future supply versus demand. Clearly show the different between actual maximum possible supply and a reliable actual supply.
- 164-20  • Increased crime NOP comment not answered
- 164-21  • schools are spilt between two districts
- 164-22  Agricultural resources were not determined.
- Should have been include because the history of the property is a cattle ranch and is surrounded by light agricultural and rural areas.

Respectfully Yours,



John Schimandle  
4100 Clover Valley Rd.  
Rocklin, CA 95677  
916-316-8566

Attachment: Clover Valley Recirculated Draft EIR Comments (10 pages)

	Page	Identifier	Comment	type
164-23	1-3	Para-2	The EIR team should be required to review all previously submitted comments. Eliminating these comments from the EIR process throws out a very large body of work that was diligently performed by many citizen and environmental groups. A large number of those comments are still applicable. What is section 15088.5(f)(1) CEQA Guidelines.	process
164-24	1-6	Para-3	Agricultural use was recently in Clover Valley as it was a cattle ranch. The ranching operation ceased just a few years ago but the land was used for cattle ranching prior to the developer purchasing the land. Agricultural use should be included as this land is available for that use if not developed. Page 4.4-2 clearly states in Existing Land Uses section "The Clover Valley property is largely undeveloped, with evidence of its ranchland history apparent." Page 4.8-2, Grassland, states there were irrigated pasture lands in the valley.	factual
164-25	1-10	Aesthetics	Maintaining the rural character was not covered in the Aesthetics section, 4.3.	omission
164-26	1-10	Land Use	Incompatibilities with the project site's surrounding communities. Homes to the east and north were omitted from the analysis.	omission
164-27	1-10	Transportation and Circulation	Some Specific concerns raised in my NOP comment were not summarized here. These include; impacts on commute times by roadway construction projects that are a results of increased traffic and already congested intersections;	omission
164-28	1-11	Biological Resources	Long term survivability of remaining oak trees and wetlands was not covered in section 4.8.	omission
164-29	1-11	Biological Resources	habitat fragmentation and plant isolation was not covered in section 4.8	omission
164-30	1-11	Biological Resources	pollution of clover valley creek was not adequately covered. It appeared to be deferred to the Hydrology and Water Quality section. Something should be mentioned here regarding the acceptable level of pollution required to sustain biological resources. Species impacted by pollution must be identified and their pollutant thresholds listed. Will raptor egg shell thickness be affected?	omission
164-31	1-11	Cultural and Paleontological Resources	Potential occurrence of unknown cultural resources on-site was not covered in section 4.7. As a matter of fact there is mention of a rock wall that is dismissed without study as non-historical. The statistical likelihood of additional artifacts were not mentioned.	omission
164-32	1-11	Geology	Sedimentation and silt build up were not covered in section 4.9	omission
164-33	1-11	Noise	Use of development sound walls was not covered in Noise section, 4.6.	omission
164-34	1-12	Public Services and Utilities	Increase Crime NOP comment not addressed	omission
164-35	4.10-16	4.10I-4	mitigation measure should include the discovery of the suspected and likely agricultural well on the site.	omission

164-36	4.11-11	paragraph 4	The word "if" should be changed to "when". The deposition of sediment is clearly spelled out in both this section and Geology section as a "normal" process for this proposed development.	misleading
164-37	4.11-13	paragraph 1	The impact is significant without mitigation and therefore should be significant. The text indicates the conceptual bridge designs do not conform to CLOMR application. The conceptual bridge designs should be modified and then re-submitted for analysis. Mitigation 4.11MM-1(a) should be completed prior to EIR approval.	misleading
164-38	4.11-20	4.11I-4	The rate of sediment accumulation is not projected. The rate of sediment accumulation is critical to how often the detention ponds will need to be dredged and thus impacting biological and down stream sediment levels. How will downstream sediment be prevented during dredging operations.	omission
164-39	4.11-8	Top of page bullets	Page 4.11-7 appears to have a typo. The page says the items listed in the bullets are not prohibited in stormwater runoff. I can't believe it's OK to dump motor oil into a storm drain.	factual
164-40	4.12-1	4.12	Missing the impact to other types of services in the area. Medical and Dental providers, medical test facilities and other types of services. I recently had to drive to Sacramento for a test because the earliest I could get in at Roseville Hospital was 2 months from now. This is unacceptable and is significant and unavoidable.	omission
164-41	4.12-14	Schools	Causing students within a single community to be split into two separate districts is not a good idea. All students should either attend RUSD schools or Loomis Schools.	concern
164-42	4.12-33	4.12I-2	waste disposal impact is shown as less-than-significant. Earlier discussions of the planned improvement to the sewer line show the impact as significant mainly due to the sewer line construction. I would rate this as significant and unavoidable.	factual
164-43	4.12-36	Law Enforcement	There is no analysis of how the development could cause potential increases in crime. No past or current crime trends are shown. It is known fact that more people brings more crime. Also, creating a new ingress/egress point into Rocklin will increase crime to those areas which used to be farther away from these points. The results are significant and unavoidable.	omission
164-44	4.12-38	4.12MM-5(a)	This mitigation is not studying with its potential impact to other areas such as open space and biologically sensitive areas. If this mitigation is required then additional study of the impacts are required.	omission

164-45	4.12-40	4.12I-7	Students being forced to attend schools other than the one in their area is a big deal for families and one that should not be taken lightly. As a long time resident and parent of this area, development pressures have caused quite a few disruptions in my children's education. Temporary shelters, no gym, unexperienced teachers and administration all cause the educational experience to be affected. Rating the project at less-than-significant is a gross understatement. Building and staffing new schools causes displacement and many problems with children and their education.	misleading
164-46	4.12-6	Table 4.12-3	Delivery capacity column is in error. The text on page 4.12-7 paragraphs 1 and 2 state that only 13,000 afa is available from the Middle Fork Project (MFP). The table incorrectly states 113,400 afa for the MFP. The total for the Yuba/Bear and MFP is 113,400 afa. This error causes the "Total Entitlements" to be off by a significant amount and should be 148,800 afa and not 248,800.	factual
164-47	4.12-6	Table 4.12-3	CVP water of 35,000 afa is not current available. The document is not clear as to the current state of this water supply. My read of the CVP water on page 4.12-3 is this source is not currently available for delivery. Also, statements on page 4.12-7 paragraph 4 seem to imply the water is not available as it lists the total Zone 1 water as 135,900 afa after a project to get more MFP water. If the 35,000 is really not available then Rocklin is in a shortage situation. Current demand plus planned is 118,542 and current delivery is only 113,400.	factual
164-48	4.12-6	Table 4.12-3	Surface Water Availability for future Demands is calculated on having each source operate at it's 100% capacity. This is an unrealistic number as there is no system in the world that can operate at 100% without interruption. A more reasonable number like 90% capacity should be assumed.	misleading
164-49	4.12-6	Water Delivery	This section is very confusing and should be restructured to give an accurate picture of current entitlements, delivery capacity and demand with respect to time. There are numerous discussions about the details that are very hard to follow. A chart showing entitlement, delivery capacity and demand in units of afa with respect to time by fiscal quarter from 2000 to 2008 is needed.	omission
164-50	4.12-9	Proposed Off-site Sewer Extension	Last paragraph refers to figures 4.12-1 through 4.12-8 which are missing from the document	omission