Final Environmental Impact Report for the

Roseville Environmental Utilities Operations Center Project

State Clearinghouse No. 2024060953

Prepared for:

CITY OF ROSEVILLE CALIFORNIA

September 2026

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Prepared for:

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Development Services - Planning
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September 2026

CITY OF ROSEVILLE CALIFORNIA

DEVELOPMENT SERVICES – PLANNING

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ERRATA SHEET TO THE FINAL ENVIRONMENTAL IMPACT REPORT

Since publication of the Final Environmental Impact Report (Final EIR) for the proposed Roseville Environmental Utilities Operations Center Project (State Clearinghouse # 2024060953) on September 16, 2026, the following sentence from the first full paragraph on page 2-28 of the Final EIR has been removed at the request of the Western Placer Waste Management Authority (WPWMA):

> Original:
>
> The comment's suggested Corporation Yard-Only (Reduced-Scope) Alternative, which would exclude the RRTO, Potential Future Organics Processing Facility, and related waste management facilities, was not evaluated in the Draft EIR because it would not meet most of the project's fundamental objectives. Specifically, it would not provide a shared location for the management of waste, recycling, and organic materials; provide the option for citywide three-cart collection services to support Senate Bill (SB) 1383 compliance; improve the sustainability and long-term flexibility of the City's waste management operations; attract recyclables, organics, and waste from outside the City to improve economies of scale; or respond to projected future solid waste service demands and regulatory requirements. The existing WPWMA facility, stated to be poised to meet current regulations, has not yet been demonstrated to meet current regulations, nor is it poised to meet future regulations.
>
> Revised:
>
> The comment's suggested Corporation Yard-Only (Reduced-Scope) Alternative, which would exclude the RRTO, Potential Future Organics Processing Facility, and related waste management facilities, was not evaluated in the Draft EIR because it would not meet most of the project's fundamental objectives. Specifically, it would not provide a shared location for the management of waste, recycling, and organic materials; provide the option for citywide three-cart collection services to support Senate Bill (SB) 1383 compliance; improve the sustainability and long-term flexibility of the City's waste management operations; attract recyclables, organics, and waste from outside the City to improve economies of scale; or respond to projected future solid waste service demands and regulatory requirements.

This revision does not constitute "significant new information" requiring recirculation. (See Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

The Final EIR is available for review during normal business hours at the City of Roseville Development Services – Planning (311 Vernon Street, Roseville). The Final EIR is also available online at: https://www.roseville.ca.gov/development_services/planning/environmental_documents_public_notices.php.

For more information on the project, please contact Jessica Lynch at (916) 774-5352 or JJLynch@roseville.ca.us.

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LIST OF ABBREVIATIONS

ADT	average daily traffic
APN	Assessor's Parcel Number
AQA	Air Quality Attainment Plan
ASP	Aerated Static Pile
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
City	City of Roseville
CNDDB	California Natural Diversity Database
EU	Roseville Environmental Utilities
FEMA	Federal Emergency Management Agency
Final EIR	final environmental impact report
GHG	greenhouse gas
HRA	health risk assessment
ITP	Incidental Take Permit
LEA	local enforcement agency
LOMR	Letter of Map Revision
LOS	level of service
$MTCO_2e$	metric tons of carbon dioxide equivalent
NESHAP	National Emission Standards for Hazardous Air Pollutants
NOP	notice of preparation
NOx	oxides of nitrogen
OIMP	Odor Impact Minimization Plan
P/QP	Public/Quasi-Public
PCA	Placer Conservation Authority
PCAPCD	Placer County Air Pollution Control District
PCCP	Placer County Conservation Program
PD	Planned Development
ppb	parts per billion
PRC	Public Resources Code
Project	Roseville Environmental Utilities Operations Center Project
RACT	Reasonably Available Control Technology
RRTO	Resource Recovery and Transfer Operations
SB	Senate Bill
SFNA	Sacramento Federal Ozone Nonattainment Area
SIP	State Implementation Plan
SMAQMD	Sacramento Metropolitan Air Quality Management District
USGS	US Geological Survey
VMT	vehicle miles traveled
VOC	volatile organic compounds

1 INTRODUCTION

This final environmental impact report (Final EIR) has been prepared by the City of Roseville (City), as lead agency, in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (CCR Section 15132). This Final EIR contains responses to comments received on the draft environmental impact report (Draft EIR) for the proposed Roseville Environmental Utilities (EU) Operations Center Project (project). The Final EIR consists of the Draft EIR and this document (response to comments document), which includes comments on the Draft EIR, responses to those comments, and revisions to the Draft EIR.

1.1 PURPOSE AND INTENDED USES OF THIS FINAL EIR

CEQA requires a lead agency that has prepared a Draft EIR to consult with and obtain comments from responsible and trustee agencies that have jurisdiction by law with respect to the project, and to provide the public with an opportunity to comment on the Draft EIR. The Final EIR is the mechanism for responding to these comments. This Final EIR has been prepared to respond to comments received on the Draft EIR, which are reproduced in this document; and to present corrections, revisions, and other clarifications and amplifications to the Draft EIR made in response to these comments. The Final EIR will be used to support the City's decision regarding whether to approve the project.

This Final EIR will also be used by CEQA responsible and trustee agencies to ensure that they have met their requirements under CEQA before deciding whether to approve or permit elements of the project over which they have jurisdiction. It may also be used by other state, regional, and local agencies that may have an interest in resources that could be affected by the Proposed Extension or that have jurisdiction over portions of the project.

Responsible agencies may include the California Department of Fish and Wildlife, California Department of Resources Recycling and Recovery, State Water Resources Control Board, Central Valley Regional Water Quality Control Board, Placer County, and Placer County Air Pollution Control District.

While not a state or local agency, the following federal agencies may use environmental information in this EIR to inform their permitting actions: the Federal Emergency Management Agency, US Army Corps of Engineers, US Environmental Protection Agency, and US Fish and Wildlife Service.

1.2 PROJECT LOCATION

The project site consists of 243 acres along Phillip Road, near its western terminus at South Brewer Road, at the northwest limit line of the City of Roseville in Placer County. The project site, which is owned by the City, is predominantly agricultural in use and is leased for rice and hay farming. Several structures are located on the site, which are remnants from a former pheasant club, agricultural support structures, and a former residence. These structures may be demolished prior to project development or some of them may be repurposed. Although the project site is 243 acres in size, the total development area is currently anticipated to be approximately 150 acres, as evaluated in this EIR, and focused within the southern portion of the project site.

The project site includes portions of Assessor's Parcel Numbers 017-010-033-000, 017-090-054-000, and 017-090-055-000. The existing General Plan land use designation for the project site is Public/Quasi-Public (P/QP), which establishes areas for municipal, governmental, or public facilities. The zoning for the project site is Planned Development (PD).

Pleasant Grove Creek is located along the site's northern boundary. The planned Pleasant Grove Stormwater Retention Basin Facility would be located to the east and the Reason Farms Preserve is located to the northeast of the project site. Other surrounding land uses include agriculture with supporting residential structures. The Creekview Specific Plan, West Roseville Specific Plan, Regional University and Community, and Amoruso Ranch Specific Plan areas are each located near or within a two-mile radius and are in various stages of development. These surrounding

land uses will allow for a total of 13,630 residential units at buildout. The Phillip Road Site Project (formerly known as the Roseville Industrial Park Project) is a proposed mixed-use development that would be located approximately two miles east of the project site.

1.3 PROJECT OBJECTIVES

The City has identified the following project objectives for the purposes of this EIR:

1. provide a shared location for the management of waste, recycling, and organic material generated by land uses within the City's jurisdiction with capacity to serve areas outside the City's jurisdiction;
2. provide the option to implement a citywide waste/recycling services three-cart set out, thereby meeting the organics and recycling diversion requirements established by Senate Bill 1383;
3. limit potential odors associated with recycling and composting by maintaining an appropriate distance from nearby residential and other sensitive uses;
4. minimize environmental impacts to surrounding areas, including residential communities and other sensitive land uses;
5. improve the sustainability of the City's waste management operations;
6. allow for City services to increase and respond to projected demands for solid waste services and changing regulations;
7. consolidate multiple EU divisions at a single location to allow for greater operational efficiencies;
8. provide a secondary corporation yard to serve the City's long-term needs and allow for the consolidation of divisions with associated efficiencies;
9. attract recyclables, organics, and waste from outside the City to improve economies of scale for the City and its customers; and
10. provide for City fleet and mobile equipment changes to comply with the Advanced Clean Fleet or similar regulations.

1.4 SUMMARY DESCRIPTION OF THE PROJECT

The City proposes to construct and operate a new EU Operations Center in northwest Roseville to provide modernized facilities to support City residents, businesses, and services. The following facilities are proposed:

- Resource Recovery and Transfer Operations (RRTO) Facility would include a materials recovery facility for recyclables receipt, materials recovery, separation into their individual commodities, and product shipment to secondary markets elsewhere; an area for municipal solid waste (MSW) receipt, staging/densification, and transfer to disposal facilities elsewhere; and an area for receiving, preprocessing, and transferring organic waste to off-site organics processing facilities;
- EU Operations Facility Corporation Yard (Corporation Yard) would provide office and storage space for the EU Department (the EU Services Facility) and an equipment maintenance facility that would provide for the parking, maintenance and repair, and fueling/charging of the EU fleet needs (assuming a fleet of up to 400 fleet vehicles and equipment), as well as an administrative office and parking for employees;
- Vendor Lease Area would provide an area available for lease to prospective vendors that could commit to deliver their waste streams to the RRTO Facility (parking would be provided for 50 to 100 collection type waste fleet trucks and a similar number of employee parking spaces); and
- Potential Future Organics Processing Facility would include a potential future compost facility and/or biomass to energy facility (biomass facility) to accommodate the combined quantities of the City's forecasted organic wastes

and organic wastes from sources outside the City. The necessity of this function in terms of both economics and technical viability will be evaluated by the City at a later time and may be subject to supplemental CEQA review. The City may or may not elect to develop this facility.

The project would be developed in two phases, as shown in Table 1-1. Phase 1 is evaluated at a project-level throughout this EIR and is anticipated to be operational by 2028. Phase 2 is evaluated at a project-level (for the RRTO expansion) and program-level (for the potential future Organics Processing Facility) throughout this EIR and may be complete by 2040. Phase 2 would provide capacity for the City through 2058.

Table 1-1 Project Overview

Project Phase	Project Component	Level of CEQA Analysis in this EIR	Site Acreage	Forecast New Staff[1]	Construction	Operation
Phase 1	RRTO Facility (Phase 1)	Project-level	40	43	March 2027 through October 2028	October 2028
	Vendor Lease Area	Project-level	5	40	March 2027 through October 2028	October 2028
	Corporation Yard ▶ EU Services Facility ▶ Equipment Maintenance Facility	Project-level	71	386	Constructed on an as-needed basis	As early as 2028
Phase 2	RRTO Facility Expansion (Phase 2)	Project-level	0 (expanded facility on same footprint)	49	Constructed on an as-needed basis	As early as 2040
	Potential Future Organics Processing Facility	Program-level	34	13	Beginning in 2035	2040
Totals	--	--	**150 acres**	**531 new staff**	--	--

Notes: EU = Environmental Utilities; RRTO = Resource Recovery and Transfer Operations.

[1] In addition to forecast new staff, it is anticipated that 165 existing staff would be relocated from the Hilltop Circle Corporation Yard to the project site.

Source: Compiled by Ascent in 2026.

A portion of the project site is within a 100-year flood zone of Pleasant Grove Creek according to Federal Emergency Management Agency (FEMA) flood maps, and is also identified as being within Roseville's Regulatory Floodplain. To develop this portion of the project site, a portion of the historically flooded area would need to be removed from the FEMA flood zone and Roseville's Regulatory Floodplain. This would require the preparation of a preliminary conditional Letter of Map Revision (LOMR) request to FEMA. Following FEMA and City approval, grading plans and construction documents would be prepared, and FEMA would review and consider for approval the final LOMR. The City would remove the northern portion of the proposed development area from the FEMA flood zone by importing fill and raising that portion of the site. Compensation for areas filled and removed from the floodplain is required such that there are no off-site increases to the 100-year water surface elevation or Base Flood Elevation.

Utility service is not currently available at the project site except for limited data and electricity. Thus, the project includes the extension of nearby water, wastewater, stormwater, data, and electrical infrastructure. The project's total estimated power demand would be approximately 20 megawatts, which would likely require development of a new substation with Roseville Electric to serve the project. To accomplish this, Roseville Electric is expected to extend an existing 60 kilovolt line from the existing supply system located near the City power production site on Phillip Road east of Westbrook Boulevard and build a new substation on the project site.

The main entry to the project site would be from Phillip Road. It would include a public driveway and an internal circulation road to provide access to a surface parking lot. Sufficient parking would be provided for operational vehicles (heavy and light duty), staff, and members of the public. Security systems would include controlled access through installation of perimeter fencing, security gates, and cameras.

Phillip Road would be improved compared to its current condition along the frontage of the project site and east to the westerly terminus of Blue Oaks Boulevard. Other developments in the region may improve portions of this alignment in advance of this project. The improvements to Phillip Road are expected to reflect the City's standard, 48-foot right of way Collector/Commercial street requirements, excluding sidewalks.

1.5 MAJOR CONCLUSIONS OF THE ENVIRONMENTAL ANALYSIS

The Draft EIR identifies significant or potentially significant impacts associated with biological resources, cultural resources, tribal cultural resources, geology and soils, hazards and hazardous materials, noise, and wildfire. These impacts can be reduced to a less-than-significant level through mitigation.

The following impacts were identified in the Draft EIR as significant and unavoidable; that is, no feasible mitigation is available to reduce the project's impacts to a less-than-significant level:

- **Aesthetics:** Visual Character and Quality (cumulative) and Light and Glare (cumulative);
- **Land Use Planning and Agricultural Resources**: Result in the Conversion of Farmland (project and cumulative);
- **Air Quality**: Long-term Operational Emissions of Criteria Air Pollutants and Ozone Precursors (project and cumulative); Create Objectionable Odors Affecting a Substantial Number of People (project and cumulative);
- **Greenhouse Gas Emissions**: Generate Greenhouse Gas Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment (project and cumulative);
- **Population, Employment, and Housing**: Potential to Induce Substantial Unplanned Population Growth (project); and
- **Transportation and Circulation**: Conflict or Be Inconsistent with CEQA Guidelines Section 15064.3(b) Regarding Vehicle Miles Traveled (project and cumulative).

1.6 CEQA PUBLIC REVIEW PROCESS

On May 7, 2026, the City of Roseville released the Draft EIR for a 45-day public review and comment period. The Draft EIR was submitted to the State Clearinghouse for distribution to reviewing agencies; posted on the City of Roseville's website (https://www.roseville.ca.gov/development_services/planning/environmental_documents_public_notices.php); and was made available at the City of Roseville Development Services – Planning (311 Vernon Street, Roseville). In addition, a notice of availability of the Draft EIR was distributed by the City to a project-specific mailing list.

A public hearing was held on May 26, 2026, to receive comments on the Draft EIR. The meeting was held as part of the Public Utilities Commission Meeting at 6 p.m. in the Roseville Electric Building located at 116 South Grant Street. No comments were received during the public hearing.

As a result of these notification efforts, written comments were received from ten commenters on the content of the Draft EIR. Chapter 3, "Responses to Comments," identifies these commenting parties, their respective comments, and responses to these comments. None of the comments received, or the responses provided, constitute "significant new information" by CEQA standards (State CEQA Guidelines CCR Section 15088.5).

Before taking action on the project, the City is required to certify that the EIR has been completed in compliance with CEQA, that the City's decision-making body reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the City.

1.7 ORGANIZATION OF THE FINAL EIR

This Final EIR is organized as follows:

- **Chapter 1, "Introduction,"** describes the purpose of the Final EIR, summarizes the Roseville EU Operations Center Project and the major conclusions of the Draft EIR, provides an overview of the CEQA public review process, and describes the content of the Final EIR.
- **Chapter 2, "Responses to Comments,"** contains a list of all parties who submitted comments on the Draft EIR during the public review period, as well as a late comment letter received July 3, 2026; copies of the comments received; and a response to each comment.
- **Chapter 3, "Revisions to the Draft EIR,"** presents revisions to the Draft EIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections.
- **Chapter 4, "References,"** identifies the documents used as sources for the analysis.
- **Chapter 5, "List of Preparers,"** identifies the lead agency contacts as well as the preparers of this Final EIR.

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2 RESPONSES TO COMMENTS

This chapter contains reproduced comments from letters received during the public review period for the Draft EIR, which concluded on June 22, 2026, as well as a late comment letter received July 3, 2026. No comments were received during the May 26, 2026, Public Utilities Commission public hearing. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIR.

The comment letters below are reproduced exactly as they were submitted. Spelling, grammatical, and other errors in the original letters have not been corrected.

2.1 LIST OF COMMENTERS ON THE DRAFT EIR

Table 2-1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

Table 2-1 List of Commenters

Letter No.	Commenter	Date
	TRIBES (T)	
T1	United Auburn Indian Community Anna Starkey, Cultural Regulatory Manager, Tribal Historic Preservation Department	May 8, 2026
	AGENCIES (A)	
A1	Department of Conservation, Geologic Energy Management Division May Soe, Supervising Oil & Gas Engineer – Northern District, Sacramento	May 5, 2026
A2	California Department of Resources Recycling and Recovery Benjamin On, Environmental Scientist, Permitting & Assistance Brach – North Section, Central Unit, Waste Permitting, Compliance & Mitigation Division, CalRecycle	June 22, 2026
A3	California Department of Fish and Wildlife Patrick Moeszinger, Senior Environmental Scientist (Specialist)	July 3, 2026
A4	Placer County Daniel Chatigny, County Executive Officer	June 22, 2026
A5	Placer County Air Pollution Control District Yushuo Chang, Planning & Monitoring Section, Supervisor	June 22, 2026
A6	City of Lincoln Angela Frost, Environmental Services Manager, City of Lincoln Public Works Department	June 18, 2026
A7	Western Placer Waste Management Authority Scott Scholz, General Manager	June 22, 2026
A8	Placer Conservation Authority Greg McKenzie, Executive Director	June 20, 2026
	COMPANIES (C)	
C1	Pacific Gas & Electric Plan Review Team, Land Management	May 12, 2026

2.2 COMMENTS AND RESPONSES

The written individual comments received and the responses to those comments are provided below. The comment letters are reproduced verbatim in their entirety. No edits have been made to the original comments, and spelling, grammatical, and other errors have been retained.

2.2.1 Tribes

Letter T1 United Auburn Indian Community

Anna Starkey, Cultural Regulatory Manager, Tribal Historic Preservation Department
May 8, 2026

Comment T1-1
Thank you. I reviewed the TCR chapter and do not intend to comment on it. Looks good.

Response T1-1
The comment confirms receipt of the Tribal cultural resources chapter of the Draft EIR and states that the Tribe does not intend to comment on it. Because no specific issues related to the content, analysis, or conclusions in the Draft EIR are raised in this comment, no further response is required.

2.2.2 Agencies

Letter A1 Department of Conservation, Geologic Energy Management Division

May Soe, Supervising Oil & Gas Engineer – Northern District, Sacramento
May 5, 2026

Comment A1-1
Public Resources Code (PRC) section 3208.1 establishes re-abandonment responsibility when previously plugged and abandoned oil, gas or geothermal wells will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near previously abandoned oil, gas, and geothermal wells.

The California Geologic Energy Management Division (CalGEM) has received the above-referenced project dated 5/1/2026. To assist local permitting agencies, property owners, and developers in making safe and practical land use decisions regarding potential development near oil, gas, or geothermal wells, CalGEM provides a table in the attached enclosure of the wells within the parcel boundary or in its vicinity, based on CalGEM's Well Finder database (https://maps.conservation.ca.gov/doggr/wellfinder/).

CalGEM categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking at the landowner's expense if there is a need to access a well. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment (consisting of well servicing rig, pumping equipment, pipe trailer) to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure. Impermeable barriers such as asphalt, concrete, and plastic may trap hazardous gases and liquids underneath and could create a safety hazard if built over a well that later develops a leak.

CalGEM recommends that any well for which access is impeded or built over, against CalGEM's advice, should be evaluated by a qualified petroleum professional for compliance with the statutory objectives of isolating all hydrocarbon-bearing strata; protecting underground and surface waters; prevention of subsequent damage to life, health, property, and other resources; and prevention of loss of oil, gas, or reservoir energy. CalGEM recommends that wells that do not meet these standards are abandoned or re-abandoned prior to construction. The well information can be accessed through CalGEM's Well Finder database mentioned above. PRC section 3208, subdivision (a), provides the primary statutory authority for CalGEM to oversee adequate abandonment of wells. Additionally, CalGEM has developed the regulatory guidance for operators to be followed during well abandonment, which are listed within California Code of Regulation, title 14 (CCR) section 1723 and associated sub-sections (for onshore wells), and section 1745 and associated sub-sections (for offshore wells).

There is no guarantee that a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. Due to the inability to predict all subsurface conditions or changes, it always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. CalGEM acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantee that such abandoned wells will not leak.

CalGEM advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations in Latitude and Longitude, NAD 83 decimal format, and leak testing results should be provided to CalGEM. CalGEM expects any wells found leaking to be reported to CalGEM immediately.

PRC section 3208.1 gives CalGEM the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for re-abandonment as:

1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.
2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be re-abandoned, or to follow the advice of the supervisor or district deputy not to undertake construction that impedes access, then the person or entity causing the construction over or near the well shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.
3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the re-abandonment.

Should any wells require abandonment or re-abandonment, the responsible party must submit a Notice of Intention (NOI) to CalGEM through WellSTAR. The NOI form can be accessed in the 'Plugging and Abandonment' section of the following link: https://www.conservation.ca.gov/calgem/for_operators.

No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. CalGEM also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR section 1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below the surface of the ground. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from CalGEM is required before work can start.

CalGEM makes the following additional recommendations to the local permitting agency, property owner, and developer:

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, CalGEM recommends that information regarding the below identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.
2. CalGEM recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

As indicated in PRC section 3106, CalGEM has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to CalGEM's authority to order work on wells pursuant to PRC sections 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC sections 3236, 3236.5, and 3359 for violations within CalGEM's jurisdictional authority. CalGEM does not regulate grading, excavations, or other land use issues.

Should you have any questions, or if any wells are encountered that were not part of this letter, contact CalGEM at 916-322-1110 or via email at CalGemNorthern@conservation.ca.gov

Enclosure: The wells listed below are reported to be located within and nearby the parcel boundary and may have future access impeded.

API No.	Well Name
There are no wells in the project area	

Response A1-1

The comment states that development near oil, gas, or geothermal wells can pose safety risks and requires maintaining access to wells, avoiding construction over them, and testing for leaks, with re-abandonment required if well integrity is compromised. Responsibility for re-abandonment may fall on the property owner, developer, or other parties depending on circumstances, and all well work requires CalGEM approval. The comment also states that no wells are present within the project area. Because the commenter identifies no wells in the project area, and identifies no specific issues related to the content, analysis, or conclusions in the Draft EIR, no further response is required.

Letter A2 California Department of Resources Recycling and Recovery

Benjamin On, Environmental Scientist, Permitting & Assistance Brach – North Section, Central Unit, Waste Permitting, Compliance & Mitigation Division, CalRecycle
June 22, 2026

Comment A2-1

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

The City of Roseville Development Services (City), acting as Lead Agency, has prepared and circulated a Draft Environmental Impact Report (DEIR) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The City proposes to construct and operate a new Environmental Utilities (EU) Operations Center in northwest Roseville. The total development area is currently anticipated to be approximately 150 acres, as evaluated in this DEIR, and focused within the southern portion of the project site. The zoning for the project site is Planned Development (PD). Pleasant Grove Creek is located along the site's northern boundary. The project site includes portions of Assessor's Parcel Numbers 017-010-033-000, 017-090-054-000, and 017-090-055-000. The planned Pleasant Grove Stormwater Retention Basin Facility would be located to the east and the Reason Farms Preserve is located to the northeast of the project site.

The proposed project would construct and operate new modernized facilities and services in northwest Roseville to support City residents, businesses, and services. The project would include new facilities and services that would allow the City to cost effectively meet state-level legislation requirements, while providing space to grow for the Roseville EU Department's services and staff.

The following facilities are proposed:

- Resource Recovery and Transfer Operations (RRTO) Facility would include a materials recovery facility; an area for municipal solid waste receipt, staging/densification, and transfer to disposal facilities elsewhere; and an area for receiving, preprocessing, and transferring organic waste to off-site organics processing facilities;
- Potential Future Organics Processing Facility would include a potential future compost facility and/or biomass to energy facility. The necessity of this facility will be evaluated by the City at a later time and may be subject to supplemental CEQA review. The City may or may not elect to develop this facility.

Response A2-1

The comment is an introductory statement and also summarizes the project description provided in the Draft EIR; the comment does not address the content, analysis, or conclusions in the Draft EIR. Therefore, a response is not required. Responses to specific comments concerning environmental issues are provided below.

Comment A2-2

COMMENTS

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Draft IS/ND, in addition to the specific location noted.

Comments for the Draft IS/ND are summarized in Italicized font below:

Chapter ES.2 Summary Description of the Project
Page 15.

"The project site consists of 243 acres along Phillip Road, near its western terminus at South Brewer Road, at the northwest limit line of the City of Roseville in Placer County."

Is there an exact address of where the proposed facility will operate?

What are the projected days and hours of operations for the Resource Recovery and Transfer Operations (RRTO)?

Response A2-2

The comment asks whether there is an exact address of where the proposed facility will operate and what the projected days and hours of operations for the Resource Recovery and Transfer Operations (RRTO) are. The project site is located on Phillip Road. There is not currently an address assigned to the project site; however, as identified on page 2-1 of the

Draft EIR, the project site includes portions of Assessor's Parcel Numbers (APNs) 017-010-033-000, 017-090-054-000, and 017-090-055-000. The project site is shown in Figures 2-1 and 2-2, among others, in the Draft EIR.

Regarding the anticipated hours of operation, page 2-20 of the Draft EIR states:

> Typical operational hours for Phase 1 would be 5 a.m. to 10 p.m., with the majority of staff working from 7 a.m. to 7 p.m. Some facilities, however, would need to operate 24 hours per day. At ultimate buildout of Phase 2, the facility would operate 24 hours per day throughout the year. Waste hauling to and from the site would generally be concentrated to the hours of 6 a.m. to 5 p.m.

Comment A2-3
Chapter 2.6.2 Potential Permits and Approvals Required
Page 58.

The project applicant should work with the local enforcement agency (LEA) for review and approval of the project particulars prior to implementation.

Response A2-3
The comment states that the City should work with the local enforcement agency (LEA) (which is the Placer County Environmental Health Department) for review and approval of the project prior to implementation.

The City will coordinate with the LEA, as appropriate, for review and approval of the project in accordance with applicable regulatory requirements prior to implementation.

Comment A2-4
Mitigation Measure 3.1-1: Implement a Litter Mitigation Program
Page 75.

"Once the project is operational, the City Solid Waste Division shall fund a continuous litter mitigation program that includes collecting and disposing roadside litter from along the roadways tributary to the site daily (Monday-Friday) on public roads within 1 mile of the project site and weekly within 2 miles of the project site. The litter mitigation program shall include routine monitoring of where litter occurs, logging of complaints, and the deployment of staff to perform litter removal activities. The City shall report the effectiveness of the litter mitigation program to the Local Enforcement Agency. The Solid Waste Division shall also employ a litter management program that collects litter from the site, its fences, and roadways each operating day."

Pursuant to Title 14 California Code of Regulations section 17408.1 Litter Control, Litter at operations and facilities shall be controlled, and routinely collected to prevent safety hazards, nuisances or similar problems and off-site migration to the greatest extent possible given existing weather conditions.

The LEA is responsible for inspecting the solid waste facility for litter control as part of a monthly or a focused inspection.

Response A2-4
The comment restates the requirements of Title 14 CCR Section 17408.1 regarding litter control and describes the LEA's role in inspection but does not comment on or request a revision to Mitigation Measure 3.1-1. Mitigation Measure 3.1-1 requires implementation of a comprehensive litter control program, including routine collection, monitoring, and reporting, consistent with regulatory requirements. Therefore, no further response is required.

Comment A2-5
Multiple pages
Biomass/Gasification Facility

In section 3.3-4 mitigation measures for "Implement Clean Construction Fleet" it is noted: "The HRA for combined Phase 1 and Phase 2 of the project evaluated all on-site activities as well as the operation of a potential future compost facility and a 2.5 MW potential future biomass gasification facility, which could be developed at full operation (2058) of the project."

Please clarify the biomass gasification facility is not projected to operate until 2058. Any proposed biomass project should meet the definition of "biomass conversion" pursuant to the Public Resources Code section 40106.

Response A2-5

The comment requests clarification that the proposed biomass gasification facility would not operate until 2058 and states that any such facility must meet the definition of "biomass conversion" under Public Resources Code (PRC) Section 40106. The Potential Future Organics Processing Facility (which could include a potential future compost facility and/or biomass facility) is described on page 2-18 of the Draft EIR as a potential project component that could be pursued by the City and is evaluated at a programmatic level in the EIR. As identified on page 2-25 of the Draft EIR, the Potential Future Organics Processing Facility would be part of Phase 2 of the project, with construction anticipated to begin as early as 2035 and operation in 2040 (Phase 2 would provide capacity for the City through 2058).

Comment A2-6

Appendix A

Table 1 Resource Recovery and Transfer Operations Facility

Table one shows the combined projected throughputs for the Recyclables (Material Recovery Facility), Organics, and MSW Transfer (Transfer Processing). If the Organics Processing Facility is an uncertain, the tonnage for the Organics should not be added into the Recyclables and MSW Transfer totals.

Response A2-6

The comment refers to Table 1 in the Notice of Preparation (NOP), which is attached as Appendix A to the Draft EIR. Since the NOP was issued in June 2024, the project details have been further refined. See Chapter 2, "Project Description," of the Draft EIR for the current project details. Table 3.15-7 in the Draft EIR presents the same information that was included in Table 1 in the NOP.

Although development of the Organics Processing Facility is uncertain, managing these materials (in terms of collection, receipt and transfer elsewhere) is a necessary function of this project. As a part of the City's response to SB 1383 requirements, the City of Roseville intends to employ a three-cart waste, recyclables, and organics materials collection system. Organics materials collected from city entities would be delivered to the RRTO and unloaded. The RRTO would need to receive and ship these materials to processing facilities elsewhere. Therefore, these materials need to be included in the facility quantities to track both their quantities, and the vehicle counts of collection trucks arriving with the organics and transfer trucks taking the organic materials to off-site organics processing facilities elsewhere.

Comment A2-7

Appendix A

Table 2 Proposed building sizing

Table 2 shows a construction and expansion timeline for all proposed buildings in 2028, 2044, and 2058. Will the proposed expansion of the RRTO facility building in 2044 or 2058 impact the throughput of the proposed 420 tons per day?

Will the RRTO be capable of processing 420 tons per day (TPD) when first constructed? If the RRTO facility will not be capable of processing 420 tpd, what throughput capacities will be tied to each of the building expansions? As an example, in 2028 the RRTO can process X amount of material in tons per day, in 2044 RRTO can process X amount of material? The DEIR should clarify the tonnage thresholds for future expansions associated with all proposed solid waste handling activities (material recovery facility, transfer processing, and the organics facility). As an example if in 2028 the tons per day is 420, will there be an increased tons per day of material processed projected for 2044 or 2058?

Response A2-7

The comment asks whether the proposed expansion of the RRTO facility building in 2044 or 2058 will impact the throughput of 420 tons per day for the single-stream MRF processing line as identified in the third column of Table 2 in Appendix A. Table 2 was included in the NOP, which was released prior to preparation of the Draft EIR, to convey how the project would evolve over time to accommodate population growth and associated growth in the waste stream.

During preparation of the Draft EIR, the City decided to more precisely define the project as occurring in two distinct phases. As described in Table 2-2 on page 2-7 of the Draft EIR, Phase 1 would include a 200,000-square-foot RRTO building that would be operational by 2028. As identified in Table 2-1 on page 2-6 of the Draft EIR, Phase 1 construction is estimated to accommodate a near-term throughput capacity of 270,000 tons per year. The 200,000-square-foot RRTO building is assumed to include a single-stream MRF processing line that would process the portion of these 270,000 tons that are recyclable.

As identified in Table 2-1 and Table 2-2 of the Draft EIR, Phase 2 would include expansion of the RRTO building by 122,000 square feet to accommodate a long-term estimated throughput capacity of 660,000 tons per year. Phase 2 expansion is assumed in the Draft EIR to occur in 2040. The single-stream MRF processing line is assumed to be expanded in Phase 2 in proportion to the increased tonnage of materials received. In response to the comment's first question, because the single-stream MRF processing line would be sized to meet the recyclable material processing demands associated with each project phase, construction of the project's second phase would not adversely affect the throughput capacity of the first phase single-stream MRF processing line.

The comment also asks if the RRTO will be capable of processing 420 tons per day when first constructed. The comment is assumed to be referring to the single-stream MRF processing line, as identified in the third column of Table 2 in Appendix A. As discussed above, the 200,000-square-foot RRTO building is assumed to include a single-stream MRF processing line that would be sized sufficiently to process the portion of the 270,000 tons of materials received in Phase 1 that are recyclable. The sizing of the processing line is expected to occur during the facility design phase but as an example, to accommodate the processing of 420 tons per day (assuming a double shift), the single-stream processing line would require an area within the building of approximately 50,000 square feet. As proposed, the 200,000-square-foot RRTO building would have sufficient capacity to accommodate a single-stream MRF processing line that could process 420 tons per day.

The comment states that the Draft EIR should clarify the tonnage thresholds for future expansions. As discussed above and in Table 2-1 of the Draft EIR, Phase 1 is estimated to accommodate a near-term throughput capacity of 270,000 tons per year, and Phase 2 is estimated to accommodate a long-term throughput capacity of 600,000 tons per year. The building sizing and acreages for these throughputs are identified for both phases in Table 2-2 on page 2-7 of the Draft EIR.

Comment A2-8
Solid Waste Regulatory Oversight

The Placer County Environmental Health Department is the Local Enforcement Agency (LEA) for Placer County and is responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact the LEA, Jason Phillippe, at 530.745.2300 to discuss the regulatory requirements for the proposed project.

Response A2-8
The comment states that the Placer County Environmental Health Department is the LEA and requests that the City contact the LEA to discuss the regulatory requirements for the project. Because no specific issues related to the content, analysis, or conclusions in the Draft EIR are raised in this comment, no further response is required.

Comment A2-9
CONCLUSION

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the Final EIR and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision making body.

If you have any questions regarding these comments, please contact me at 916.341.6753 or by e-mail at Benjamin.On@calrecycle.ca.gov.

Response A2-9

The comment requests ongoing notification and document distribution with regard to the project. The City will comply with applicable noticing requirements and will include CalRecycle on distribution lists for future environmental documents and notices, as appropriate.

Letter A3 California Department of Fish and Wildlife

Patrick Moeszinger, Senior Environmental Scientist (Specialist)
July 3, 2026

Comment A3-1

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Availability of a Draft Environmental Impact Report (DEIR) from the City of Roseville for the Roseville Environmental Utilities Operations Center Project (Project) pursuant the California Environmental Quality Act (CEQA) statute and guidelines.[1] CDFW previously submitted comments in response to the Notice of Preparation of an Environmental Impact Report on July 22, 2024.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, native plants, and their habitat. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code.

CDFW ROLE

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

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

Response A3-1

The comment is an introductory statement and does not address the content, analysis, or conclusions in the Draft EIR. The comment also explains that the California Department of Fish and Wildlife (CDFW) serves as a Trustee Agency and may also act as a Responsible Agency under CEQA. The comment states that the project may be subject to CDFW regulatory authority, including Lake and Streambed Alteration Agreement requirements and, if applicable, authorization for the take of species protected under the California Endangered Species Act (CESA). The Draft EIR acknowledges the regulatory authority of CDFW (see Section 2.6, "Potential Permits and Approvals Required," which lists CDFW as a potential permitting agency for a Section 1602 Lake and Streambed Alteration Agreement) and evaluates the project's potential impacts on biological resources. To the extent project implementation requires approvals, permits,

agreements, or authorizations from CDFW, including any Lake and Streambed Alteration Agreement or authorization under CESA, the City will obtain such approvals and comply with all applicable regulatory requirements.

Comment A3-2
PROJECT DESCRIPTION SUMMARY

The Project site is located on Phillip Road on 243 acres of undeveloped land along the northwest boundary of Roseville, in the City of Roseville, Placer County. The Project site includes portions of Assessor's Parcel Numbers (APNs) 017-010-033-000, 017-090-054-000, and 017-090-055-000. Although the project site is 243 acres in size, the total development area evaluated in the DEIR is approximately 150 acres positioned within the southern portion of the Project site. The Project footprint also includes approximately 3 miles along Phillip Road, from the Project site east to its terminus at Blue Oaks Boulevard.

The Project consists of the construction and operations of a new Environmental Utilities Operations Center with several components intended to provide modernized facilities to support City residents, businesses, and services. The Project will be constructed in two phases. Phase 1 is anticipated to be constructed and operational by 2028, while Phase 2 may be constructed and operational by 2040.

Phase 1 Project activities include the construction of a Resource Recovery and Transfer Operations Facility, Environmental Utilities Operations Facility Corporation Yard, and Vendor Lease Area on approximately 116 acres of the Project site. Phase 2 Project activities include the construction of a Potential Future Organics Processing Facility on approximately 34 acres of the Project site. Import of fill and grading within the 100-year floodplain of Pleasant Grove Creek will take place during Phase 1 Project activities, although a portion of this area is located within the Potential Future Organics Processing Facility that would not be constructed until Phase 2 of the Project.

Additionally, Project construction includes the extension of water, wastewater, data, and electrical infrastructure, as well as road improvements along the alignment of Phillip Road to the western terminus of Blue Oaks Boulevard located approximately 3 miles to the east.

Response A3-2
The comment summarizes the project description provided in the Draft EIR but does not address the content, analysis, or conclusions in the Draft EIR. Therefore, a response is not required. Responses to specific comments concerning environmental issues are provided below.

Comment A3-3
COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City of Roseville in adequately identifying and, where appropriate, mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

COMMENT 1: Western Burrowing Owl, DEIR Section 3.5.2 Regulatory Setting, page 3.5-11

Issue: Table 3.5-2 incorrectly identifies the status of western burrowing owl (*Athene cunicularia hypugaea*) as a state Species of Special Concern. On October 10, 2024, the California Fish and Game Commission designated western burrowing owl as a CESA candidate species, affording the species the same protection as a CESA listed species, including prohibition of take of individuals.

Additionally, Table 3.5-2 concludes that western burrowing owls are not expected to occur on the Project site because current suitable habitat is limited to earthen berms that are covered by high and dense grass, precluding use by the species.

Based on a review of recent California Natural Diversity Database (CNDDB) submissions and CDFW project records, approximately eighteen (18) western burrowing owl occurrences have been documented within four (4) miles of the Project site over the past two (2) years. Several of these western burrowing owl observations occur within proximity to the Project site and proposed offsite infrastructure improvements along Phillip Road, within the Amoruso Ranch

Specific Plan, West Roseville Specific Plan, Curry Creek Community Plan, and Regional University Specific Plan Areas, as well as the Country Acres Clean Power project site.

While the DEIR recognizes dry annual or perennial grasslands, shrublands, and low-growing vegetation with the presence of fossorial mammal burrows as suitable habitat for western burrowing owls, the DEIR fails to acknowledge that western burrowing owl may also occur in agricultural areas, vacant lots, industrial areas, and associated buffers, if there are suitable burrows and foraging habitat in proximity. In addition to fossorial mammal burrows, western burrowing owls may also utilize natural rock cavities, debris piles, culverts, and pipes for both nesting and cover.

Given the abundance of western burrowing owls recently documented in proximity to the Project site, CDFW believes the Project may result in significant impacts to western burrowing owl that were not identified and analyzed in the DEIR. Project Phases 1 and 2 are planned to be constructed over the course of several years, and will convert approximately 150 acres of rice, hay, annual grasslands, and disturbed/developed areas within the Project site to vacant lots, industrial areas, stormwater/detention basins, and landscaped areas and buffers that may provide both suitable foraging and nesting/cover habitat for the species, and may result in owls occupying the Project site during both construction and operation. Many of the recent western burrowing owl observations in the Project vicinity have occurred on active construction sites following the fallowing of rice and initial vegetation clearing and grading activities, and those owls have utilized non-natural features such as culverts, storm drains, debris piles, and staged construction materials for cover/refugia.

Project activities that have the potential to result in take of western burrowing owls, their nests, or eggs during construction and/or operation of the Project include grading, disking, earthmoving, burrow blockage, heavy equipment compacting and crushing burrow tunnels, stormwater facility maintenance, and burning/mowing. In addition, the following activities may destroy or degrade western burrowing owl habitat during Project construction and/or operation: eradication of host burrowers; changes in vegetation management; use of pesticides and rodenticides; destruction, conversion or degradation of nesting, foraging, over-wintering or other habitats; destruction of natural burrows and burrow surrogates; and disturbance which may result in harassment of owls at occupied burrows.

Recommendation or Recommended Mitigation Measure: CDFW recommends Table 3.5-2 be updated to reflect the western burrowing owl is currently a candidate species under the CESA.

Response A3-3

The comment states that the Draft EIR incorrectly identifies the western burrowing owl as a California Species of Special Concern rather than a candidate species under CESA. The comment also states that recent western burrowing owl occurrences have been documented near the project site and expresses concern that the project could affect western burrowing owls and their habitat. The comment recommends updating Table 3.5-2 to reflect the species' current CESA candidate status.

Table 3.5-2 has been updated to reflect the current CESA candidate status of western burrowing owl. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes. However, the analysis and conclusions in the Draft EIR remain valid. Prior to the 2024 field survey of the project site, queries of the CNDDB (including unprocessed data), iNaturalist, and eBird databases were conducted to identify recorded occurrences of western burrowing owl within the Pleasant Grove and surrounding eight US Geological Survey (USGS) 7.5-minute quadrangles. These data sources represent the best data available, and the information from these sources was used to prepare the biological resources analysis in the Draft EIR (see the full list of sources that was used in preparation of the Draft EIR biological analysis on page 3.5-1).

A pedestrian survey of the project site was conducted on April 3, 2024, and adjacent parcels were visually surveyed from accessible public areas using binoculars and a spotting scope. No burrowing owls, occupied burrows, or other evidence of use were observed during the survey on the project site. At the time of the field survey in 2024, the adjacent parcels to the southwest consisted of active rice fields, which do not provide suitable habitat for western burrowing owl.

The comment identifies several recent western burrowing owl observations in the vicinity of the project site. As stated in the comment, the occurrences closest to the project site were documented after the rice paddies were graded for new construction projects (SMUD 2022; CNDDB 2026). Similarly, the observations to the northeast of the project site, were recorded in the construction footprint of the Amoruso Ranch during winter 2024. These observations were made during winter, indicating that these are not breeding observations but rather migrating owls wintering in the area. The nearest of these observations, 19 burrowing owls using culverts as cover, was documented in 2025 immediately south of Phillip Road within approximately 340 feet of the project site. That observation indicated that although one pair was observed during the nesting season, the owls left the site by April 2025 and there was no indication of breeding. Construction of the Country Acres Clean Power project is ongoing, and the observations from 2026 are approximately 4,200 feet south of Phillip Road, which is outside of CDFW's 500-meter (1,640-foot) recommended survey buffer for western burrowing owls. Western burrowing owls this far from the project site would not be adversely affected by project activities.

The Draft EIR acknowledges that western burrowing owls may use a variety of habitat types when suitable burrows, cover features, and foraging habitat are present (see Table 3.5-2 on page 3.5-12). The conclusion in the Draft EIR that western burrowing owl is not expected to occur on the project site was based on site-specific conditions observed during the 2024 field survey, including the absence of suitable nesting burrows, occupied burrows, or evidence of owl use, rather than solely on the general land use designation of the site.

Current conditions at the project site do not provide habitat suitable for western burrowing owl. Existing rice and hay fields are still being farmed and would continue to be farmed until the start of project construction. The portion of the site that would not be developed would remain in rice production. Accordingly, the project site does not currently provide suitable nesting habitat for western burrowing owl, and this impact would remain less than significant. Nonetheless, the Draft EIR has been revised to acknowledge that the species may occur in the vicinity of the project site, and new Mitigation Measure 3.5-2k has been added that requires the City to conduct preconstruction surveys for western burrowing owl and, if warranted, implement avoidance and minimization measures. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes.

Comment A3-4

CDFW also recommends the DEIR be revised to require burrowing owl surveys to be completed by a qualified biologist in areas of suitable habitat on and within 500 meters of the Project site (if accessible) prior to ground disturbing activities, for each phase of the Project. Surveys should be conducted according to Appendix D of the 2012 CDFW Staff Report on Burrowing Owl Mitigation. Surveys should be conducted during both the breeding (February 1 to August 31) and non-breeding seasons (September 1 to January 31). If feasible, at least one survey should be conducted between February 15 and April 15 and the remaining surveys should be conducted between April 15 and July 15, at least three weeks apart. Additionally, because burrowing owls may recolonize a site after only a few days, two surveys should be conducted within 14 days before initiating ground disturbing activities, or after a lapse between Project activities, to ensure that take of burrowing owl does not occur. The final take avoidance survey should be conducted within 24 hours prior to ground disturbance.

If burrowing owls are found during surveys, CDFW recommends the City establish and maintain a buffer around the occupied burrow/refugia and any identified satellite burrows/refugia to prevent take of burrowing owls. During the non-breeding season (September 1 to January 31) the buffer distance should be a minimum of 50 to 500 meters depending on the level of disturbance. During the breeding season (February 1 to August 31) the buffer distance should be a minimum of 200 to 500 meters depending on the level of disturbance. During all project activities adjacent to burrowing owl buffers, a qualified biologist should be present to monitor the behavior of the burrowing owls and have the authority to halt Project activities and adjust buffers if owls are disturbed or show signs of agitation. All buffers should remain in place until a qualified biologist confirms, through non-invasive methods, that the burrows/refugia are no longer occupied by burrowing owls.

CDFW also recommends the DEIR should be modified to state that if take of burrowing owl cannot be avoided, then the City should obtain a CESA Incidental Take Permit (ITP) and provide suitable mitigation that fully mitigates the Project

impacts. If burrowing owl is found and proposed to be impacted, early consultation with CDFW is encouraged, as modifications to the proposed Project and mitigation measures may be required in order to obtain an ITP.

Please note that mitigation measures that are adequate to reduce impacts to a less-than significant level to meet CEQA requirements may not be enough for the issuance of an ITP. To facilitate the issuance of an ITP, CDFW recommends the DEIR include details pertaining to the permanent protection and perpetual management of compensatory habitat necessary to fully mitigate project-related impacts, both permanent and temporary. The type and amount of mitigation should be based on factors including an assessment of the importance of that habitat in the Project site, the extent to which covered activities will impact the habitat, and the estimate of the acreage required to provide for adequate compensation in coordination with CDFW.

Response A3-4

The comment recommends additional mitigation measures for western burrowing owl, including preconstruction surveys for each project phase, establishment of seasonal avoidance buffers around occupied burrows, biological monitoring during nearby construction activities, consultation with CDFW, and obtaining a CESA Incidental Take Permit and compensatory mitigation if take cannot be avoided.

As described in response to comment A3-3, the Draft EIR has been revised to acknowledge that western burrowing owl may occur in the vicinity of the project site, and a new mitigation measure has been added to require the City to conduct preconstruction surveys for western burrowing owl and, if warranted, implement avoidance and minimization measures. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes.

The project is not anticipated to result in the "take" of any state-listed species. Therefore, the project is not expected to require issuance of an ITP. If an ITP is determined to be necessary prior to project construction, the City would work closely with CDFW to provide all of the information necessary for ITP issuance. Further, new Mitigation Measure 3.5-2k (in Chapter 3, "Revisions to the Draft EIR," of this Final EIR) includes a requirement that if implementation of a buffer to prevent take of burrowing owl is not feasible, the City shall consult with CDFW and obtain an ITP prior to commencing project related ground-disturbing activities.

Comment A3-5

COMMENT 2: Placer County Conservation Program, DEIR Section 3.5.3 Environmental Impacts and Mitigation Measures, page 3.5-22

Issue: The DEIR states that the Project site is not within the Placer County Conservation Program (PCCP) plan area and the City is not a participant in the PCCP, therefore, the issue is not discussed further in the DEIR.

The Project site is located immediately adjacent to the PCCP Reserve Acquisition Area (RAA) and is bordered on both the north and west by two PCCP reserve system properties, the Clemetson property to the west, and the Mourier West property across Pleasant Grove Creek to the north. Together with the Reason Farms Environmental Preserve, Al Johnson Wildlife Area, PCCP Mourier East preserve, Toad Hill Ranch Mitigation Bank, and other conserved lands, these properties form an approximately 4,116-acre block of conservation lands designed to link the Pleasant Grove Creek corridor with existing and future PCCP reserve lands that provide habitat for the PCCP's covered species. Additionally, CEQA Guidelines section 15125(d) states that EIRs must discuss any inconsistencies between projects and applicable plans (including habitat conservation plans/natural community conservation plans). The DEIR incorrectly characterizes the neighboring PCCP reserve land as "agricultural land" (DEIR pg. 3.5-6). and as a result, fails to disclose or analyze potential direct and indirect effects to the biological resources associated with those PCCP reserve lands. Although the City is not a participant in the PCCP, CEQA requires that EIRs analyze the Project's reasonably foreseeable physical effects on the sensitive biological resources of the adjacent reserve (CEQA Guidelines, §§ 15126.2, subd. (a), 15358, subd. (a)(2)).

Recommendation or Recommended Mitigation Measure: Because the Project site is bordered by the PCCP RAA and existing reserve lands, CDFW recommends that the DEIR be revised to include a discussion of each Project alternative's consistency with the PCCP and how the City will ensure that implementation of the Project alternatives do not impede the PCCP's ability to meet its permit conditions and biological goals and objectives. Particular focus in the DEIR's analysis should be directed to:

- Analysis of potential impacts to all PCCP Covered Species.
- Assessment of project impacts to natural communities and constituent habitat types identified in the PCCP.
- Identification of applicable PCCP avoidance, minimization, or mitigation measures.
- Discussion of any inconsistencies between the Project and the PCCP.

Response A3-5

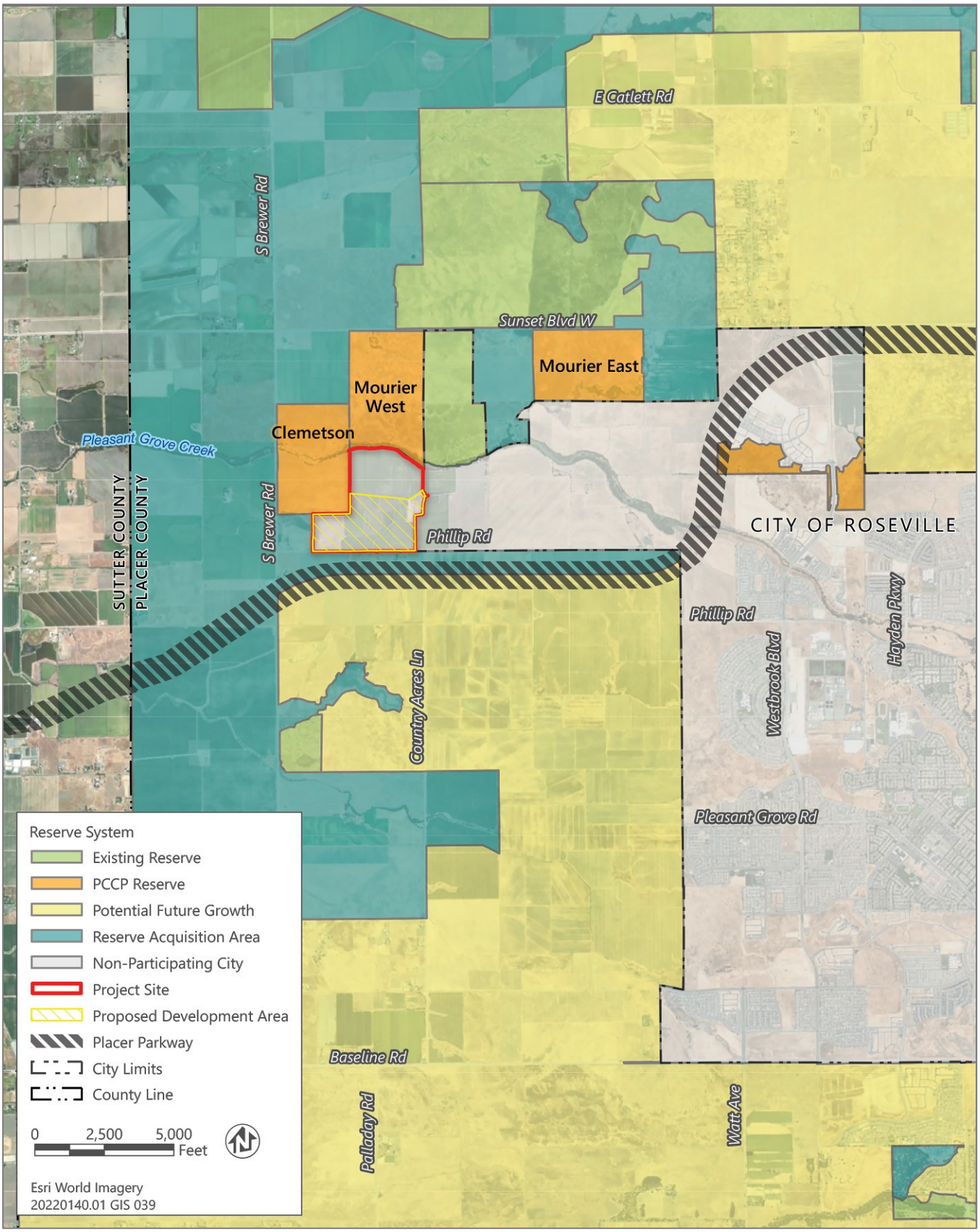
The comment states that the Draft EIR does not adequately address the project's proximity to lands protected under the Placer County Conservation Program (PCCP). The comment states that the project site is adjacent to PCCP reserve lands and recommends that the EIR evaluate consistency with the PCCP, analyze potential impacts to PCCP-covered species and habitats, identify applicable avoidance and mitigation measures, and discuss any inconsistencies between the project and the PCCP. As stated in the Draft EIR, the project site is not located within the PCCP plan area, and the City is not a participant in the PCCP. Accordingly, the project is not subject to the PCCP's permit requirements, conservation strategy, or mitigation framework.

Nevertheless, the Draft EIR evaluates the project's direct and indirect impacts on biological resources consistent with CEQA, including special-status species, sensitive habitats, wildlife movement, and adjacent biological resources. Section 3.5, "Biological Resources," of the Draft EIR considers the existing environmental setting surrounding the project site, including nearby open space, waterways, and habitat areas and identifies mitigation measures to avoid or minimize impacts where appropriate. The significance determinations are based on the project's potential physical effects on biological resources, regardless of ownership or conservation status of adjacent lands. In response to comments received on the Draft EIR, the analysis of Impact 3.5-4 and Mitigation Measure 3.5-4b have been revised to further evaluate and address the potential for indirect impacts on off-site wetlands resulting from project implementation. In addition, Mitigation Measure 3.5-5 has been expanded to also apply to the nearby reserve properties to minimize lighting impacts. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes.

The City identified the project site as early as 2003 for City use. As described in Chapter 2, "Project Description," of the Draft EIR, the City purchased the project site (and the larger Reason Farms area) in 2003. Since the purchase, the project site has been intended for future City use, and uses not limited to a wildlife area. The existing General Plan land use designation for the project site is Public/Quasi-Public (P/QP), which primarily allows for municipal and governmental facilities. The zoning for the project site is Planned Development (PD). As a public facility, the project would be consistent with the P/QP land use designation and PD zoning district.

The City acknowledges that portions of the lands adjacent to the project site were added to the PCCP reserve system after the City issued the NOP and conducted its biological fieldwork, and provide habitat values that contribute to the PCCP conservation network. Figure 2-1 in this Final EIR shows the project site in relation to the surrounding PCCP reserve system mapped in 2026.

City staff met with PCA staff in July 2026 to discuss PCA's concerns regarding the project and the potential for conflicts with the adjacent reserve properties. PCA staff indicated that their concerns were associated with the potential for conflicts along the shared property lines associated with trash, public access, and the possible presence of domesticated animals, namely cats. City staff indicated that the project site adjacent to the reserve properties would not be accessible to the public and that there would be no housing associated with the project; thus, there would not be any pets at the project site. City staff also indicated that the City is willing to work with PCA on edge treatments to minimize the potential for conflicts that could affect the reserve properties, including the use of buffers, walls or fencing, and design changes to the orientation of the site to place uses less likely to cause impacts along the edges of the project site. Because the project design has not been completed yet, EU staff agreed to work with PCA staff in the future and share information on design to reduce the potential for impacts.



Source: Data downloaded from Placer Conservation Authority in 2026; adapted by Ascent in 2026.

Figure 2-1 Project Site and Surrounding Conservation Land

Field observations conducted during the April 2024 biological survey of the project site indicated that portions of the western adjacent property were being actively grazed and exhibited characteristics consistent with grazed grassland conditions at the time of the survey. During the April 2024 survey, off-site areas were viewed through binoculars by a qualified biologist. Although the biologist observed low areas north of the project site, the areas were dry and lacked vegetation, and no potential regulated wetlands were observed. However, information subsequently provided by PCA in July 2026 indicates that wetlands do likely occur on adjacent lands that are now designated as PCCP reserve properties (Figure 2-2 in this Final EIR shows the potential wetlands on the Clemetson property, to the west of the project site, as provided by PCA). Regardless of the land use designation or conservation status of adjacent properties, the Draft EIR biological resources analysis evaluated the potential for project-related direct and indirect effects on adjacent habitats, special-status species (including PCCP Covered Species), sensitive natural communities, and wildlife movement corridors. Accordingly, the impact analysis was not dependent upon whether adjacent lands were characterized as agricultural land, open space, or existing or future PCCP reserve lands.

While the City acknowledges the project's proximity to PCCP reserve properties, proximity to PCCP lands does not, by itself, require a separate consistency analysis under CEQA. The Draft EIR provides an analysis of potential impacts to biological resources that may occur on or adjacent to the project site. The Draft EIR does not identify substantial evidence that the project would impede implementation of the PCCP, interfere with reserve management objectives, or preclude achievement of the PCCP's biological goals and objectives. Therefore, the biological resources analysis and conclusions remain unchanged. As discussed above, revisions have been made to the analysis of Impact 3.5-4 and Mitigation Measure 3.5-4b to further address potential indirect effects on off-site wetlands, and Mitigation Measure 3.5-5 to further address potential edge effects on adjacent reserve properties; however, these revisions do not alter the significance determinations or conclusions presented in the Draft EIR.

Also, see responses to comment letter A8 from the Placer Conservation Authority (PCA) regarding the PCCP and adjacent reserve lands.

Comment A3-6

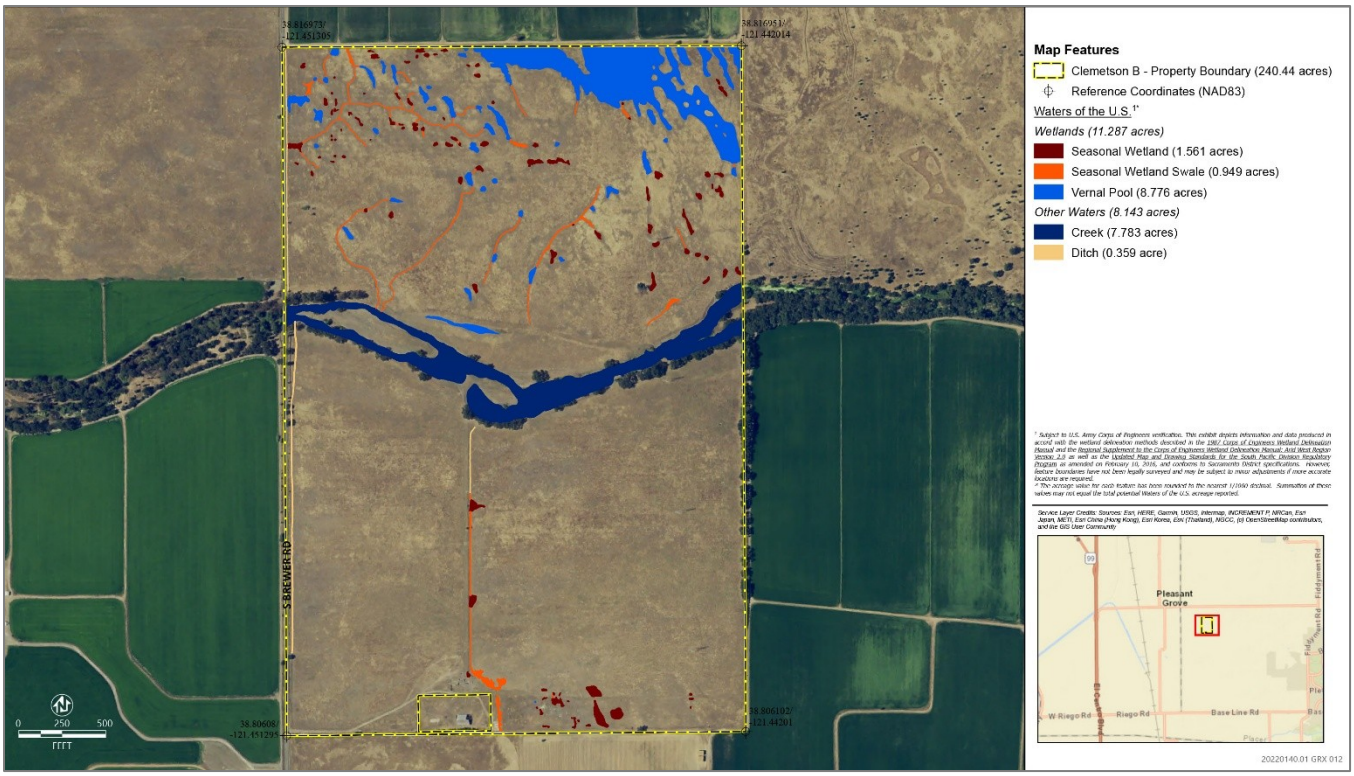
To identify any potential inconsistencies with the PCCP and provide special emphasis on rare or unique resources in compliance with CEQA, CDFW recommends the EIR also address the following:

- Impacts to established or future reserve lands managed under the Placer Conservation Authority (PCA).
- Reduction of available reserve lands in the PCCP (with appropriate buffers and setbacks as detailed in the PCCP).
- Impacts to PCCP conservation zones and key habitat linkages.

Response A3-6

The comment recommends that the EIR evaluate potential effects on the PCCP reserve system, including impacts to existing and future reserve lands, reductions in available reserve lands, and impacts to PCCP conservation zones and habitat linkages. As discussed in the Draft EIR and in response to comment A3-5, the project site is not located within the PCCP plan area and is not subject to PCCP's permit requirements, conservation strategy, or mitigation framework. The Draft EIR evaluates the project's potential direct and indirect impacts on biological resources consistent with CEQA and considers the project's relationship to adjacent habitat areas and other biological resources. The City has concluded that the biological resources analysis adequately addresses the types of impacts identified by the comment and the comment does not provide substantial evidence that the project would result in significant effects to PCCP reserve lands, conservation zones, or habitat linkages beyond those analyzed in the Draft EIR. Accordingly, no changes to the Draft EIR are required.

Also, see responses to comment letter A8 from PCA regarding the PCCP and adjacent reserve lands.



Source: Data provided by Placer Conservation Authority in 2026; adapted by Ascent in 2026.

Figure 2-2 Potential Wetlands on the Clemetson Property (West of the Project Site)

Comment A3-7

Although the Project is not subject to the requirements of the PCCP, because the Project site borders the PCCP RAA, CDFW recommends the City incorporate the PCCP's Development Interface Design Requirements (PCCP Section 6.3.1.2) into the Project final design. The development interface design elements contained in the PCCP were developed to minimize the indirect effects of infrastructure and urban development projects adjacent to PCCP reserve lands, mitigation and conservation banks, and any other property protected for natural lands management.

Response A3-7

The comment recommends that, although the project is not subject to the PCCP, the City incorporate the PCCP's Development Interface Design Requirements into the project design to minimize indirect effects on adjacent PCCP reserve lands and other protected natural resource areas. As discussed in responses to comments A3-5 and A3-6, the project is not located within the PCCP plan area and is not subject to PCCP's permit requirements, conservation strategy, or mitigation framework. Nevertheless, the Draft EIR evaluates the project's potential direct and indirect impacts on adjacent biological resources and identifies avoidance, minimization, and mitigation measures, as appropriate, to reduce biological impacts.

The City recognizes that the PCCP's Development Interface Design Requirements were developed to address potential edge effects associated with development adjacent to conservation lands. These include design measures to minimize runoff, hydrologic changes, invasive species, unauthorized access, wildlife disturbance, and other indirect or long-term effects. Required measures may include educational signage, appropriate fencing and barriers, limited access points, minimized shared boundaries, wildlife-compatible road fencing, shielded low-intensity lighting, setbacks for brightly lit facilities, and non-invasive or native landscaping. These measures must remain within the development footprint, be maintained by property owners, and be enforced through project conditions, inspections, code enforcement, securities, or entitlement modifications, with additional site-specific protections applied as needed. The Draft EIR evaluated the project's potential indirect impacts on adjacent biological resources, including special-status species, sensitive habitats, and wildlife movement. In addition, the project consists of a managed solid

waste and resource recovery facility and does not include residential development or other land uses commonly associated with many of the edge effects addressed by the PCCP interface standards.

The Draft EIR already includes measures intended to reduce indirect effects on adjacent biological resources, including, but not limited to, implementation of wildlife-friendly building design (Mitigation Measure 3.5-5, as revised in this Final EIR); limitations on outdoor lighting and light spillover (Mitigation Measures 3.1-2 and 3.5-5); avoidance and minimization measures for special-status species and nesting birds (Mitigation Measures 3.5-1 and 3.5-2a through 3.5-2j); and other mitigation measures designed to protect adjacent environmental resources (Mitigation Measures 3.5-3, 3.5-4a, 3.5-4b, and 3.5-6). Therefore, the project has been designed and mitigated consistent with the PCCP's Development Interface Design Requirements. The Draft EIR analysis concludes that implementation of these measures would avoid or minimize indirect impacts to adjacent biological resources. Further, the Draft EIR does not identify substantial evidence that the project would interfere with management of adjacent PCCP reserve lands, substantially degrade habitats within those lands, or impede implementation of the PCCP's conservation objectives.

While the City acknowledges that the project is not a covered activity under the PCCP and is therefore not required to comply with the PCCP's Development Interface Design Requirements, the City has decided to incorporate applicable Development Interface Design Requirements identified in PCCP Section 6.3.1.2.1 into the final project design as a voluntary measure to further minimize potential indirect effects on adjacent reserve lands (this portion of the PCCP is appended to this Final EIR as Appendix A). These measures will supplement the mitigation measures already identified in the Draft EIR and will help reduce the potential for edge effects such as wildlife disturbance, lighting impacts, unauthorized access, invasive species introduction, and other indirect effects on adjacent biological resources. With incorporation of these design measures and implementation of the mitigation measures identified in the Draft EIR (as revised in the Final EIR), the project's potential indirect impacts on adjacent biological resources would be avoided or minimized. Accordingly, the biological resources analysis and conclusions presented in the Draft EIR remain unchanged.

Also, see responses to comment letter A8 from PCA regarding the PCCP and adjacent reserve lands.

Comment A3-8
ENVIRONMENTAL DATA

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

Response A3-8
The comment requests that any special-status species or sensitive natural communities identified during Project surveys be reported to the California Natural Diversity Database (CNDDB) in accordance with CEQA and CDFW guidance. To the extent special-status species or sensitive natural communities are documented during project surveys and such reporting is warranted, survey information will be submitted to the CNDDB consistent with applicable CDFW guidance and reporting procedures.

Comment A3-9
FILING FEES

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

Response A3-9
The comment states that the project would have impacts on fish and wildlife resources and advises that payment of the applicable CDFW filing fee is required upon filing the Notice of Determination. The City will comply with all applicable CEQA filing requirements, including payment of the CDFW filing fee, as required at the time the Notice of Determination is filed.

Comment A3-10
CONCLUSION

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

CDFW appreciates the opportunity to comment on the DEIR for the Roseville Environmental Utilities Operations Center Project to assist the City in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this letter or further coordination should be directed to myself.

Response A3-10
The comment requests written notification of proposed actions and pending decisions for the project pursuant to Public Resources Code Sections 21092 and 21092.2. The City will provide notices as required by applicable provisions of CEQA and will continue to coordinate with CDFW, as appropriate, during project review and implementation.

Letter A4 Placer County

Daniel Chatigny, County Executive Officer
June 22, 2026

Comment A4-1
Placer County appreciates the opportunity to engage at this stage of the process. After reviewing the Draft Environmental Impact Report, the County offers the following comments.

TRANSPORTATION/CIRCULATION

1. The proposed Project is in the vicinity of the approved alignment of the Placer Parkway plan line. As requested in comments following our review of the Notice of Preparation (NOP), the EIR should include an exhibit of the approved plan line for Placer Parkway in relation to the proposed Project. The EIR should also include a discussion of Placer Parkway and identify any impacts that the Project may have on/to the approved Placer Parkway plan line as well as the increased traffic volumes expected on the roadway from this project. The cumulative scenario should include traffic operations analysis of intersections along the Placer Parkway corridor and identify improvements, if needed.

Response A4-1
The comment requests that the EIR include an exhibit showing the approved Placer Parkway plan line in relation to the proposed project and discuss potential effects on the approved alignment. The comment also requests analysis of project-related traffic volumes on Placer Parkway and cumulative traffic operations at intersections along the Placer Parkway corridor, including identification of any needed improvements.

Impacts related to traffic facility operations and level of service (LOS) were removed as a required topic of analysis under CEQA by SB 743 (passed by the California Legislature in 2013 and implemented statewide in 2020). Therefore, the operations-related questions raised by the comment are outside the scope of CEQA. However, the following discussion is provided for informational purposes. The approved Placer Parkway alignment is shown in Figure 2-3 in this Final EIR, in relation to the proposed project. The project site is located on the north side of Phillip Road, and the Placer Parkway planned corridor alignment is 300+ feet south of Phillip Road. Due to this distance, there would be no conflicts.

Placer Parkway is envisioned as a limited access, free flowing facility with a capacity of 70,000+ average daily traffic (ADT) in the initial 4-lane configuration and over 100,000 ADT in the ultimate 6-lane configuration, the proposed project trips would represent a negligible impact to Placer Parkway. The project site is located 2 miles from the nearest planned Placer Parkway interchange at the vicinity of Blue Oaks Boulevard and Santucci Boulevard, and 4.5 miles from the next interchange beyond that. The exact location, configuration, and connection(s) to Blue Oaks Boulevard and Santucci Boulevard are uncertain at this time and are unable to be analyzed. The traffic analysis estimates 399 peak hour trips in the 2040 cumulative scenario, 30 percent of which are estimated to access Placer Parkway at the future Blue Oaks Boulevard/Santucci Boulevard interchange. This equates to 120 vehicles/hour during the peak traffic period, which would be negligible in relation to typical 4-6 lane highway volumes and 6-lane intersection volumes.

Because the project is projected to contribute approximately 120 vehicles/hour to the future Blue Oaks Boulevard/Santucci Boulevard interchange during peak traffic periods, representing a very small percentage of future Placer Parkway peak traffic volumes, the project would not result in a measurable effect on operations at future Placer Parkway corridor intersections. Therefore, no project-specific improvements to the future Placer Parkway corridor are warranted.

Comment A4-2

2. As requested in comments following review of the NOP, the EIR needs to consider all potential impacts to County Roadways, due to the location of the Project at the City/County boundary. Along with the traffic impact analysis and mitigation related to operation of the site for multiple City division offices, the EIR should include those associated with solid waste collection vehicles needing to bring all Resource, Recovery and Transfer Operations (RRTO) material to and from the site for final disposal or processing elsewhere.

Specifically, discussion and analysis should consider traffic impacts due to:

a. Transport of residual waste from the RRTO to a final destination for landfilling.

b. Transportation of waste to and from the RRTO from jurisdictions outside of the City of Roseville.

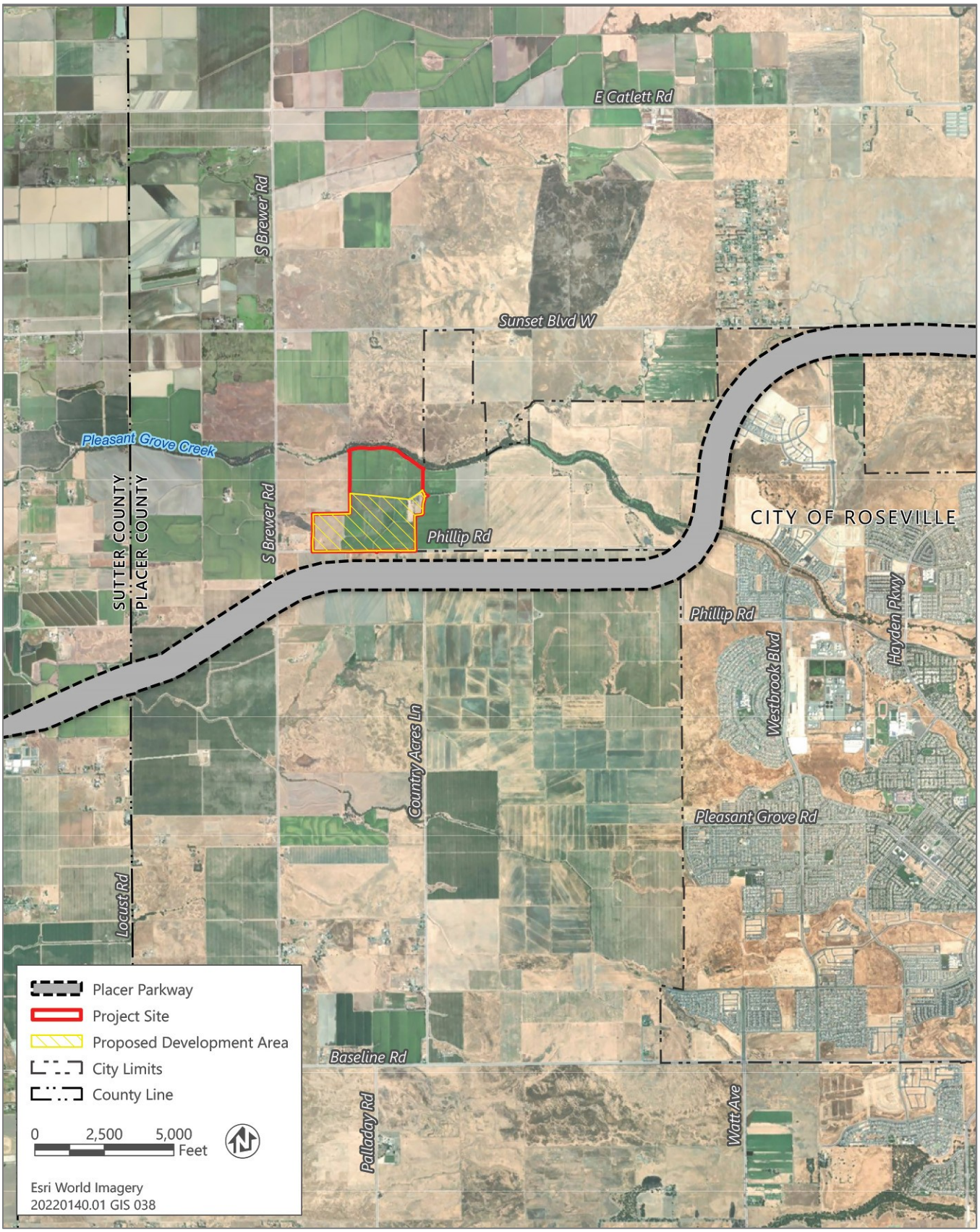
c. Transport of organic waste from the RRTO for composting elsewhere.

d. Transport of recovered materials from the RRTO to markets.

The EIR should consider the impacts on the local County roadways as their existing conditions are not equipped to handle any significant increase in vehicle traffic.

Response A4-2

The comment requests that the EIR evaluate potential traffic impacts on County roadways associated with project operations, including vehicle trips generated by City offices and RRTO activities. The comment specifically requests analysis of traffic related to the transport of residual waste, organic waste, recovered materials, and waste from jurisdictions outside the City, and consideration of whether local County roadways can accommodate the resulting increase in traffic.



Source: South Placer Regional Transportation Authority et al. 2009 (Figure 1); adapted by Ascent in 2026.

Figure 2-3 Placer Parkway Alignment Near the Project Site

Impacts related to traffic facility operations and level of LOS were removed as a required topic of analysis under CEQA by SB 743 (passed by the California Legislature in 2013 and implemented statewide in 2020). Therefore, the operations-related questions raised by the comment are outside the scope of CEQA. However, the following discussion is provided for informational purposes. As described in Section 3.16, "Transportation and Circulation," of the Draft EIR, project trip generation estimates include both employee vehicle trips and truck trips associated with project operation. The transportation analysis includes approximately 586 daily truck trips associated with project operation (see Table 3.16-2 in the Draft EIR). Truck trips evaluated in the Draft EIR include the transport of residual waste from the RRTO to landfill disposal facilities, transport of recyclable and recovered materials to off-site processing facilities and end markets, transport of organic materials to composting or other processing facilities, and inbound and outbound material movement associated with operation of the facility. These activities represent the operational function of the transfer facility and are reflected in the project traffic estimates. Accordingly, the transportation analysis includes the categories of vehicle trips identified in the comment (see items 2[a] through 2[d]), including residual waste hauling, transfer of waste from jurisdictions served by the facility, movement of organic materials for processing, and shipment of recovered materials to end-use markets. This operational truck traffic is reflected in the project's approximately 586 daily truck trips evaluated in the transportation analysis.

The Draft EIR evaluates project-generated traffic on the surrounding transportation network serving the project, including local and regional roadways that provide access to and from the site. The project site is located within the City and adjacent to the City and unincorporated Placer County boundary; the transportation analysis considers project-related travel on surrounding roadway facilities regardless of jurisdictional ownership. The analysis concludes that the project's primary transportation impact would be an increase in vehicle miles traveled (VMT), which is identified as a significant and unavoidable impact under CEQA even after implementation of Mitigation Measures 3.16-2a and 3.16-2b. No additional significant impacts related to transportation were identified.

The County's concern regarding the ability of nearby roadways to accommodate project-related truck traffic is acknowledged. The Draft EIR analysis evaluates truck traffic associated with operation of the proposed RRTO facility and incorporates those trips into the project's transportation forecasts. While project-generated traffic may utilize County roadways in the vicinity of the project site, roadway maintenance, rehabilitation, and repair of existing facilities are generally the responsibility of the agency with jurisdiction over the roadway and are not typically required as mitigation for development projects unless a project would cause a significant transportation impact necessitating such improvements. Existing roadway maintenance or repair needs are existing conditions and are not attributable to project-generated traffic. Consistent with CEQA, the Draft EIR evaluates whether the project would result in a significant impact to the transportation system through conflicts with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; conflicts with CEQA Guidelines Section 15064.3, subdivision (b) related to VMT; increased hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; and inadequate emergency access. As discussed in Section 3.16, project-related truck traffic was included in the transportation analysis, and the Draft EIR does not identify significant impacts requiring mitigation beyond those disclosed in the EIR.

Comment A4-3

According to the traffic analysis, the project traffic would increase traffic by approximately 50% on South Brewer Road. Roadways like Phillip Road and South Brewer Road are frequently flooded during winter storms, have narrow lanes, poor pavement condition, minimal signage/striping, no shoulders, no lighting, and narrow bridges. These roadways are not suitable for regular use by heavy vehicles and increased passenger cars from employee trips without significant improvements. Intersection geometry needs to be looked at as well to ensure these large vehicles can safely make all necessary turning movements. Intersections such as Baseline Road/South Brewer Road need to be analyzed for additional turn lanes for project traffic to maintain safety.

Response A4-3

The comment states that project traffic is expected to substantially increase traffic volumes on South Brewer Road and expresses concern regarding roadway suitability. The comment requests analysis of roadway and intersection

improvements needed to accommodate heavy vehicles and employee traffic, including evaluation of turning movements and potential turn-lane improvements at intersections such as Baseline Road and South Brewer Road.

The traffic analysis estimates 59 PM peak hour truck trips and 340 peak hour passenger vehicle trips in the 2040 cumulative scenario with approximately 10 percent of all vehicle trips using Baseline Road via South Brewer Road. This equates to approximately 1 passenger vehicle every two minutes and 1 truck every 10 minutes during the PM peak hour. Given these relatively low traffic volumes, project traffic would not substantially alter roadway operations on South Brewer Road.

The County's stated concerns regarding roadway width, pavement condition, flooding, signage, striping, shoulders, lighting, and bridge geometry were considered. These roadway characteristics are existing conditions. The project would not modify these facilities or introduce traffic volumes sufficient to create a significant transportation safety or operational impact. In addition, the Traffic Impact Analysis evaluated project access and site circulation, including accommodation of anticipated truck traffic. Based on the number of project trucks expected to utilize South Brewer Road, additional turn lanes or intersection modifications at Baseline Road/South Brewer Road are not warranted by project traffic and no significant impact was identified.

Comment A4-4

3. The County's NOP comments requested that the transportation study prepared for the project identify any impacts or effects to the County roadways and intersections. The Traffic Impact Analysis included with the EIR did not include any analysis for any county intersections or roadways. Additional analysis is required at a minimum for the following intersections: Phillip Road and South Brewer Road, South Brewer Road and Baseline Road, Baseline Road and Locust Road, Baseline Road and Pleasant Grove Road, and all Placer Parkway intersections under cumulative conditions. Traffic signal warrants should also be included for unsignalized County intersections. Include an updated trip distribution exhibit to include the unincorporated county area near the project site. The County had requested to be involved in the scope of work process for this effort with our comments on the NOP.

Response A4-4

The comment states that the Traffic Impact Analysis does not evaluate impacts on County roadways and intersections and requests additional analysis of specified County intersections, including cumulative traffic conditions along the Placer Parkway corridor. The comment also requests evaluation of traffic signal warrants at unsignalized County intersections, an updated trip distribution exhibit that includes nearby unincorporated County areas, and County involvement in the transportation analysis process.

Impacts related to traffic facility operations and LOS were removed as a required topic of analysis under CEQA by SB 743 (passed by the California Legislature in 2013 and implemented statewide in 2020). Therefore, the operations-related questions raised by the comment are outside the scope of CEQA. However, the following discussion is provided for informational purposes. The traffic study estimates that approximately 10 percent of project vehicles would enter or exit the project site from the west via County roadways. As described in the Traffic Impact Analysis (Appendix E of the Draft EIR), approximately 10 percent of project trips are anticipated to use South Brewer Road and Baseline Road to access destinations west of the project site, while the majority of project traffic would travel east toward the City roadway network and regional facilities. This equates to approximately 40 vehicles in the PM peak hour in the 2040 cumulative scenario. Accordingly, the project's contribution to traffic along County roadways would be limited.

While it may be reasonable to analyze the nearest County intersections, such as Phillip Road/South Brewer Road and South Brewer Road/Baseline Road, the project's contribution to more distant intersections, including Baseline Road/Locust Road and Baseline Road/Pleasant Grove Road, would be minimal and would not be expected to substantially affect intersection operations. Accordingly, additional analysis of those intersections is not warranted given the limited project traffic anticipated to reach those locations. Similarly, the project's contribution of approximately 40 PM peak-hour trips is not sufficient to warrant project-specific traffic signal warrant studies at the identified unsignalized County intersections. The project would not be expected to substantially influence whether signal warrants are met at these locations.

The County also requested an updated trip distribution exhibit to include the unincorporated County area near the project site. The traffic analysis includes project trip distribution assumptions that account for travel to and from the adjacent unincorporated County area west of the project site. The existing trip distribution figures (see Figures 7 and 8 in Appendix E to the Draft EIR) already depict travel entering and exiting the project area through the adjacent roadway network. Although Figures 7 and 8 do not depict the full County roadway network west of the project site, the trip distribution assumptions used in the traffic analysis account for travel to and from the unincorporated County area. The figures were intended to illustrate the general distribution of project trips and are not the basis for the VMT calculations or impact conclusions presented in the Draft EIR.

The County's request to participate in development of the transportation analysis scope of work is acknowledged. The City considered transportation-related comments received during the NOP review process in preparing the Draft EIR and has further addressed the County's transportation comments through the responses provided in this Final EIR.

The County's comments regarding analysis of impacts to Placer Parkway are addressed in response to comment A4-1.

Comment A4-5

4. Based on the EIR and the size of the RRTO, it is expected that the site will receive waste from jurisdictions outside of the city limits. Clearly identify where waste is expected to be collected from and transported to the Project facility. The increased traffic volumes on roadways outside of the city limits need to be analyzed in the EIR as well as considered in the Traffic Impact Analysis. The County roadways in the rural western portion of the County are not in a condition to handle any significant increase in traffic, especially the heavy vehicle trips that would be expected.

Response A4-5

The comment requests that the EIR identify the jurisdictions from which waste is expected to be collected and transported to the RRTO facility and evaluate the associated transportation routes. The comment also requests analysis of increased traffic volumes, including heavy vehicle trips, on roadways outside the city limits and their effects on County roadways.

The proposed RRTO facility is intended to provide resource recovery and transfer operations for materials managed by the City. The specific jurisdictions and service areas that may utilize the facility over time would depend on future service agreements and operational needs; however, the transportation analysis conservatively evaluates the truck and passenger vehicle trips associated with operation of the facility at full capacity irrespective of the ultimate origin or destination of individual waste streams. As discussed in response to comment A4-2 and Section 3.16, "Transportation and Circulation," of the Draft EIR, project trip generation estimates include truck traffic associated with receipt, transfer, processing, and shipment of materials handled at the RRTO, including residual waste destined for disposal facilities, recyclable materials sent to processors and end markets, organic materials transported for processing, and inbound and outbound material movement associated with facility operations.

As described in Section 3.16 and response to comment A4-4, the Draft EIR transportation analysis evaluates project-generated vehicle and truck trips on the roadway system expected to serve the project. The analysis incorporates the estimated heavy-duty truck trips associated with project operations and evaluates whether those trips would result in substantial transportation-related impacts. As discussed in Section 3.16, "Transportation and Circulation," the Draft EIR evaluates transportation impacts using the significance criteria identified in CEQA Guidelines Section 15064.3 and Appendix G. Consistent with current CEQA requirements, the transportation analysis focuses on VMT, consistency with plans, policies, and ordinances addressing the circulation system, transportation hazards, and emergency access. The Draft EIR concludes that the project would result in a significant and unavoidable VMT impact and less-than-significant impacts related to the remaining CEQA transportation issue areas. Operational traffic analyses addressing roadway and intersection performance were prepared as part of the Traffic Impact Analysis included in Appendix E for informational and planning purposes.

The County's concern regarding the condition of rural roadways west of the project site is acknowledged. Existing roadway maintenance, rehabilitation, and repair needs are existing conditions and are generally the responsibility of the agency with jurisdiction over the roadway. As discussed in response to comment A4-2, CEQA requires evaluation

of impacts caused by the project. The Draft EIR evaluates whether the project would result in a significant impact to the transportation system through conflicts with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; conflicts with CEQA Guidelines Section 15064.3, subdivision (b) related to VMT; increased hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; and inadequate emergency access. The Draft EIR concludes that the project would result in a significant and unavoidable VMT impact and less-than-significant impacts related to consistency with circulation plans and policies, transportation hazards, and emergency access.

The comment raises a concern that project-related truck traffic could adversely affect rural County roadways west of the project site due to existing roadway conditions and the addition of heavy vehicles. Appendix E includes estimates of project-generated truck traffic and trip distribution assumptions. As described in the Traffic Impact Analysis, approximately 10 percent of project traffic is anticipated to travel west of the project site via South Brewer Road and Baseline Road, while the majority of project traffic would travel east through the City roadway network. To the extent certain County roadways may currently require maintenance, rehabilitation, or repair, those conditions are existing baseline conditions.

CEQA requires evaluation of physical environmental effects caused by the project. The Draft EIR evaluates the transportation impacts required under CEQA, including VMT, consistency with circulation plans and policies, transportation hazards, and emergency access. Therefore, no revisions to the Draft EIR are required in response to this comment.

Comment A4-6

5. South Brewer Road and a portion of Phillip Road west of the project site are County Maintained roadways. As requested previously in the NOP comments, the EIR should clearly identify if construction traffic will use these County roadways, along with any County roadways north of the site. If construction traffic has the potential to use these roadways, then impacts to the existing roadway surface may occur. A discussion of the existing surface condition of South Brewer Road and the County portion of Phillip Road and any Project impacts to the roadway surface should be included in the EIR. A mitigation measure should be included to provide a video/photo survey of the existing surface and a cash security deposit to the County for any necessary repairs and/or restoration of the roadways to their original pre-project condition. Prior to occupancy and use of the site, roadway surfacing should be repaired and/or restored prior to release of any security.

Response A4-6

The comment requests that the EIR identify whether construction traffic would use County-maintained roadways, including South Brewer Road and the County-maintained portion of Phillip Road, and evaluate potential impacts to roadway surfaces from construction-related traffic. The comment also requests documentation of existing roadway conditions and measures to ensure repair or restoration of any roadway damage resulting from project construction.

Construction access routes have not been finalized and may include use of Phillip Road, Blue Oaks Boulevard, and other roadways serving the project area. As discussed in Section 3.16, "Transportation and Circulation," of the Draft EIR, project construction would result in temporary truck and equipment trips associated with site grading, utility installation, roadway improvements, and building construction. Construction traffic would be required to comply with all applicable City, County, and State requirements governing the transport of equipment and materials, including vehicle weight limitations, load securement requirements, designated haul routes where applicable, and any encroachment permit conditions imposed by the agency with jurisdiction over affected roadways. These requirements are intended to ensure that construction vehicles operate within established roadway design and safety parameters and to address any roadway protection measures deemed necessary by the responsible agency.

The County's concern that construction traffic could contribute to deterioration of South Brewer Road, the County-maintained portion of Phillip Road, or other County roadways is acknowledged. Project construction would generate temporary truck trips associated with delivery of materials, export or import of earth materials (if necessary), and operation of construction equipment. However, these activities would occur over a limited construction period and would not introduce a long-term or ongoing source of heavy vehicle traffic.. To the extent that roadway condition

concerns exist on South Brewer Road, Phillip Road, or other County roadways, such conditions represent existing baseline conditions.

As discussed in response to comment A4-5 and Section 3.16, "Transportation and Circulation," the Draft EIR evaluates transportation impacts using the significance criteria identified in CEQA Guidelines Section 15064.3 and Appendix G. Consistent with current CEQA requirements, the transportation analysis focuses on VMT, consistency with plans, policies, and ordinances addressing the circulation system, transportation hazards, and emergency access. The Draft EIR concludes that the project would result in a significant and unavoidable VMT impact and less-than-significant impacts related to the remaining CEQA transportation issue areas.

The comment requests a pre-construction video or photographic survey, security deposit, and restoration of any project-related roadway damage. Such requirements, if determined necessary by the agency with jurisdiction over the affected roadway, are typically addressed through encroachment permit conditions, improvement agreements, road-use agreements, or other project permitting mechanisms that govern construction activities in the public right-of-way. Because the Draft EIR does not identify a significant transportation impact related to roadway surface conditions requiring mitigation under CEQA, the requested measures are not required as CEQA mitigation measures. Accordingly, the requested measures are not necessary to mitigate a significant impact under CEQA, although the County may impose roadway protection, documentation, repair, or restoration requirements through its separate permitting and approval processes, as appropriate.

Comment A4-7

6. Based on the proposed project and the potential impacts identified above, any project improvements extending to the west along Phillip Road including pavement transitions between the City and County jurisdiction and any improvements necessary along any other County maintained roadway including South Brewer Road would be within the County's jurisdiction. Improvements within the County's jurisdiction should be described in the EIR or described as to why no improvements are necessary based on the project's impacts to County roadways. Improvements with the County's jurisdiction would require the developer to obtain an Encroachment Permit and/or Improvement Plan approval from Placer County. These permits should be noted in the EIR sections identifying potential permits and approvals.

Response A4-7

The comment requests that the EIR describe any project-related improvements within County jurisdiction, including improvements along Phillip Road and South Brewer Road, or explain why such improvements are not necessary based on project impacts to County roadways. The comment also requests that the EIR identify required County permits and approvals, including encroachment permits and improvement plan approvals, for any improvements within County-maintained roadways.

As discussed in responses to comments A4-2 through A4-6, the Draft EIR evaluates project-generated construction and operational traffic on the surrounding transportation network. The transportation analysis includes truck and passenger vehicle trips associated with project operation and evaluates potential transportation impacts in accordance with CEQA. Based on that analysis, the Draft EIR identifies a significant and unavoidable impact related to VMT, but does not identify significant operational impacts to County roadways requiring roadway widening, intersection improvements, traffic signals, or other transportation improvements within County jurisdiction.

Improvements associated with the project are currently limited to those described in Chapter 2, "Project Description," and Section 3.16, "Transportation and Circulation," of the Draft EIR. The project includes improvements to Phillip Road adjacent to the project site and eastward toward the City roadway network. As described in Chapter 2, "Project Description," of the Draft EIR, the project includes improvements to Phillip Road to provide access to the site (see page 2-25). To the extent any portion of those improvements would occur within or affect County-maintained right-of-way, such work would be subject to County review and approval. The Draft EIR does not identify the need for other off-site transportation improvements on South Brewer Road or other County-maintained roadways as mitigation for a significant transportation impact under CEQA.

The comment correctly notes that any future work proposed within County rights-of-way or on County-maintained facilities would be subject to County review and approval. To the extent project improvements, utility work, construction access, or other activities occur within Placer County jurisdiction, the City would be required to obtain all applicable permits and approvals from Placer County, which may include encroachment permits, improvement plan review and approval, or other permits as determined appropriate by the County. Accordingly, the Project Description in the Final EIR has been revised to clarify that implementation of project improvements affecting County-maintained facilities may require County-issued permits and approvals. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes.

Comment A4-8

1. The DEIR does not analyze a reasonable range of alternatives in compliance with CEQA Guidelines Section 15126.6.

The range of alternatives considered is narrow and does not evaluate scenarios that achieve the core project objectives while substantially lessening significant environmental impacts. The DEIR fails to isolate significant impacts and did not provide an adequate evaluation of feasible project alternatives as required by the CEQA guidelines.

The Draft Environmental Impact Report (DEIR) finds that the proposed project will result in multiple significant and unavoidable environmental impacts. Under the California Environmental Quality Act (CEQA), a lead agency must consider a reasonable range of potentially feasible alternatives that can attain most of the basic project objectives while avoiding or substantially lessening the project's significant impacts.

The current range of alternatives evaluated in the DEIR does not reasonably represent feasible, reduced-intensity configurations or adequately disclose to the public that most stated objectives are already met at an existing, nearby facility. Specifically, the DEIR fails to present a pathway to accomplish the primary, currently unmet municipal objectives without redundant components tied to irreversible environmental degradation.

A review of the DEIR's impact analysis reveals that the majority of the identified significant and unavoidable impacts are directly caused by two specific project components:

a. The Resource Recovery and Transfer Operations (RRTO);

b. The future Organic Waste Processing Facility (OWPF).

Crucially, the existing Western Placer Waste Management Authority (WPWMA) facility and the current City waste collection programs meet regional and local solid waste management objectives and are poised to meet state regulations. Because existing infrastructure achieves these goals, the environmental impacts associated with the development of the RRTO, OWPF and associated Vendor Lease Area are avoidable as these can reasonably be considered unnecessary to fulfill the City's solid waste requirements. Therefore, to comply with the CEQA "rule of reason," the DEIR must expand its alternatives analysis to include a Corporation Yard-Only alternative (Reduced-Scope Alternative). Based on the information provided in the DEIR, the County believes this alternative would isolate, reduce and/or eliminate the source of the project's substantial environmental impacts while still addressing municipal needs and objectives not already met.

Response A4-8

The comment states that the Draft EIR does not analyze a reasonable range of alternatives because it does not evaluate a reduced-scope "Corporation Yard-Only" alternative. The comment also states that most significant and unavoidable impacts are associated with the RRTO and Potential Future Organics Processing Facility components and states that existing regional waste management facilities "are poised to" meet solid waste management needs, making those components unnecessary. The comment requests that the Draft EIR evaluate a reduced-scope alternative that excludes the RRTO, Potential Future Organics Processing Facility, and related facilities.

The Draft EIR evaluates a reasonable range of alternatives consistent with CEQA Guidelines Section 15126.6, including the No Project Alternative (Alternative 1), the Reduced Development Area Alternative (Alternative 2), and the No On-site Compost or Biomass Operations Alternative (Alternative 3). These alternatives were selected because they are capable of attaining most of the project objectives while avoiding or reducing environmental impacts and provide

meaningful comparison points to the proposed project. Because the No Project Alternative assumes continued operation of the existing Corporation Yard and use of existing waste processing facilities, it captures the fundamental premise of a Corporation Yard-Only alternative. Evaluating a separate alternative with the same operational framework would not result in substantially different environmental impacts or provide additional information necessary for informed decision-making. Therefore, the Draft EIR evaluates a reasonable range of alternatives consistent with CEQA.

The comment's suggested Corporation Yard-Only (Reduced-Scope) Alternative, which would exclude the RRTO, Potential Future Organics Processing Facility, and related waste management facilities, was not evaluated in the Draft EIR because it would not meet most of the project's fundamental objectives. Specifically, it would not provide a shared location for the management of waste, recycling, and organic materials; provide the option for citywide three-cart collection services to support Senate Bill (SB) 1383 compliance; improve the sustainability and long-term flexibility of the City's waste management operations; attract recyclables, organics, and waste from outside the City to improve economies of scale; or respond to projected future solid waste service demands and regulatory requirements. The existing WPWMA facility, stated to be poised to meet current regulations, has not yet been demonstrated to meet current regulations, nor is it poised to meet future regulations.

The Draft EIR acknowledges that several significant and unavoidable impacts are associated with development of the project. However, the alternatives analysis demonstrates that eliminating the Potential Future Organics Processing Facility alone (Alternative 3) would not avoid significant and unavoidable impacts related to air quality, greenhouse gas emissions (GHG), population growth, or VMT because organic materials would still require transfer and off-site processing, resulting in additional truck trips and associated emissions. Likewise, the Reduced Development Area Alternative (Alternative 2) was specifically developed to reduce environmental impacts through a smaller development footprint while still achieving most project objectives and was identified as the environmentally superior action alternative.

The Draft EIR evaluates a reasonable range of potentially feasible alternatives in accordance with CEQA's rule of reason and provides decision-makers and the public with sufficient information regarding alternatives capable of reducing environmental impacts while meeting most of the project's objectives. No revisions to the alternatives analysis are required.

Comment A4-9

2. The DEIR does not adequately evaluate impacts related to planned external jurisdiction waste flows and facility to end market trips. The DEIR does not provide adequate data to accurately assess traffic and greenhouse gas impacts. The project plans to accept and process solid waste from other jurisdictions, but without knowing the exact origins of these waste flows, calculating trip lengths and emissions for an accurate environmental assessment is impossible. Similarly, the DEIR lacks specificity for adequate analysis related to RRTO recovered material to end market trips.

Response A4-9

The comment states that the Draft EIR does not adequately evaluate traffic and GHG impacts associated with waste received from jurisdictions outside the City and the transport of recovered materials to end markets. The comment requests additional information regarding the origins of waste streams and destinations of recovered materials to support analysis of trip lengths, vehicle travel, emissions, and associated environmental impacts.

As described in the Draft EIR Section 2.2.4, "Projected Increases in Demand for Materials Handling," future waste quantities and facility throughput were developed using projected service demand, population growth assumptions, and potential regional processing opportunities. Because future customers, waste sources, contractual arrangements, recycling markets, composting facilities, transfer facilities, and disposal facilities may change over the life of the project and are not known with certainty, the Draft EIR evaluates the potential environmental impacts of the project based on projected facility throughput and associated vehicle activity rather than speculative future routing scenarios.

As discussed in responses to comments A4-2 through A4-7, above, the Draft EIR transportation analysis evaluates project-generated vehicle trips associated with operation of the proposed facilities, including employee traffic,

collection vehicles, transfer vehicles, and other operational truck trips. The analysis is based on operational assumptions and maximum anticipated facility activity and does not depend on the precise origin or destination of individual loads.

Similarly, as discussed in responses to comment A4-11, below, the operational GHG analysis evaluates emissions associated with project throughput, vehicle activity, equipment operations, and facility operations using reasonable and conservative assumptions. Because the specific future jurisdictions, hauling contracts, or end-market destinations that may utilize the facility over its operational life are currently unknown and may change over time, the Draft EIR analysis uses reasonable planning assumptions regarding vehicle activity and travel distances rather than assuming specific future customers or destinations. CEQA does not require speculation regarding future contractual relationships that have not yet been established.

The Draft EIR acknowledges the potential for receiving materials from outside the City and includes projected throughput levels that account for such materials (see Section 2.2.4, "Projected Increases in Demand for Materials Handling"). The project's potential impacts were evaluated based on those throughput projections regardless of where the materials originate. The transportation and GHG analyses evaluate the environmental effects associated with handling the projected throughput at the facility, including truck trips associated with receipt, transfer, processing, and shipment of materials. The GHG analysis includes assumptions regarding vehicle travel distances associated with these activities, including estimated travel distances for out-of-City waste streams and, therefore, does not assume all imported materials originate immediately outside the City limits.

Accordingly, the Draft EIR evaluates transportation and GHG impacts using reasonable estimates of facility throughput, truck activity, and vehicle travel distances rather than relying on speculative assumptions regarding specific future waste sources or end-market destinations. To the extent that future third parties decide to transport materials from locations outside the City to the facility, the environmental effects of the project are appropriately evaluated based on the projected vehicle activity associated with the facility rather than the identity of particular future customers. Similarly, the future destinations of recovered materials are not currently known; therefore, the Draft EIR analysis relies on representative assumptions regarding material transport rather than speculative end-market locations. For these reasons, the Draft EIR adequately evaluates the potential transportation and GHG impacts associated with project operations, and no additional analysis is required.

Comment A4-10
Traffic Generation Impacts

The Transportation Supporting Data and Calculations concludes that the feasibility and effectiveness of the VMT mitigation measures is either insufficient or unknown at this time and goes on to say that with implementation of recommended mitigation measures the impacts remain significant and unavoidable. The VMT analysis is based on project data that lacks solid waste collection vehicle trips from locations outside of the City and/or outside of Placer County, or from the proposed project to end markets. Without this specificity, the EIR analysis is inadequate, underestimates impacts and prevents decision-makers and the public from accurately understanding the project's impacts.

Response A4-10
The comment states that the VMT analysis is inadequate because it does not specifically account for waste-hauling trips originating outside the City or Placer County, or trips from the project to end markets. The comment further states that this lack of detail may underestimate VMT impacts and limits the public's and decision-makers' ability to fully understand the project's transportation impacts. The comment also notes that VMT impacts remain significant and unavoidable after mitigation.

See responses to comments A4-1 through A4-7 regarding the County's transportation and circulation comments.

The Draft EIR transportation analysis was prepared using the best available project information and evaluates project-generated travel associated with anticipated facility operations, including employee and truck trips. The precise future origins and destinations of all waste-hauling trips, including material received from outside the City or transported to downstream facilities and end markets, are not known at this time and may change over the life of the project based

on market conditions, regulatory requirements, and operational needs. Consistent with CEQA, the analysis is based on reasonably foreseeable operational characteristics rather than speculative future routing details.

The comment correctly notes that the Draft EIR concludes that VMT impacts would remain significant and unavoidable after mitigation. As discussed in Section 3.16, "Transportation and Circulation," in the Draft EIR, implementation of Mitigation Measures 3.16-2a (Commute Trip Reduction Program) and 3.16-2b (Employee-Sponsored Vanpool Program) would reduce employee-related VMT; however, the ultimate participation rates, effectiveness, and resulting VMT reductions cannot be guaranteed. In addition, a substantial portion of project VMT is attributable to mandatory truck trips associated with facility operations, which are not readily reduced through employee commute programs. Accordingly, the Draft EIR conservatively concludes that the project cannot demonstrate with certainty that VMT would be reduced below the applicable threshold, and the impact remains significant and unavoidable (see pages 3.16-24 and 3.16-25 of the Draft EIR).

Rather than understating impacts, the Draft EIR discloses this uncertainty and errs on the side of conservatism by identifying the impact as significant and unavoidable. The Draft EIR provides sufficient information for decision-makers and the public to understand the project's transportation impacts and complies with CEQA's informational requirements. No revisions to the Draft EIR are required.

Comment A4-11
Greenhouse Gas Emission Analysis

The project DEIR determined that Phase 1 operational GHG emission impacts would be less than significant, and that Phase 2 operational GHG emissions impacts would be potentially significant and exceed bright-line thresholds of significance. Without fully disclosing GHG emissions caused by solid waste transport by haulers from external jurisdictions, the analysis is inadequate and fails to disclose the project's true impacts.

Response A4-11
The comment states that the GHG analysis is inadequate because it does not fully disclose emissions associated with solid waste hauling from external jurisdictions. The comment further states that omission of these trips may underestimate operational GHG emissions and does not accurately disclose the project's true impacts.

As discussed in response to comment A4-9, the Draft EIR evaluates transportation and GHG emissions associated with projected facility throughput, truck activity, and vehicle travel using reasonable planning assumptions and does not rely on speculative assumptions regarding the identity of future customers, waste sources, hauling contracts, or end-market destinations. The specific jurisdictions that may utilize the facility and the ultimate destinations of recovered materials may change over the operational life of the project and are currently unknown. Accordingly, the Draft EIR analysis is based on projected facility activity and associated vehicle travel rather than speculative future routing details. As discussed in response to comment A4-9, the analysis evaluates emissions associated with projected facility throughput and project-related vehicle activity. Further, as described in Section 3.16, "Transportation and Circulation," of the Draft EIR, project VMT includes the full length of trips, including travel occurring outside the City limits.

As discussed in Section 3.4, "Greenhouse Gas Emissions," of the Draft EIR, operational GHG emissions during Phase 2 are anticipated to exceed the Placer County Air Pollution Control District's (PCAPCD) threshold of 10,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year. The EIR identifies mobile sources, including waste collection vehicles, trucks, City fleet vehicles, and off-road equipment, as the primary contributors to operational GHG emissions. Although Mitigation Measure 3.4-1a would require transition toward a zero-emission City fleet and Mitigation Measure 3.4-1b would require implementation of an Emissions Capture and Control Plan for the future organics processing facility, the Draft EIR concludes that the impact would remain significant and unavoidable because project emissions would continue to exceed applicable thresholds and because the effectiveness of future technology deployment and emissions capture measures cannot be quantified with certainty (see pages 3.4-18 and 3.4-19 of the Draft EIR).

As discussed in response to comment A4-9, the Draft EIR includes emissions associated with projected project-related vehicle activity and evaluates those emissions based on projected facility operations rather than speculative assumptions regarding future waste sources or end-market destinations. Rather, it conservatively discloses that Phase 2 operational GHG emissions would remain significant and unavoidable after mitigation. Phase 2 operational

emissions are identified as significant and unavoidable because they exceed the applicable PCAPCD threshold even after mitigation. The GHG analysis provides adequate disclosure of the project's GHG impacts and complies with CEQA's informational requirements. No revisions to the Draft EIR are required.

Comment A4-12

3. The DEIR analysis does not analyze reasonably foreseeable environmental impacts related to the anticipated decrease in recyclable material processed. The DEIR projects a change in waste characterization over time, predicting a change in percentages of recyclables, organics, and MSW during projected time horizons. The report does not discuss the cause for the change in waste characterization and does not analyze environmental impacts tied to a decrease in recyclable material capture and resultant increase in landfilled material. The DEIR also neglects to compare the projected waste stream characterization, and reasonably foreseeable resultant landfill diversion, to the existing program diversion.

In the near term, the DEIR anticipates the following:

- recyclables (blue bin) would represent 38% of the waste stream,
- MSW (black bin destined for landfill) would represent 39% of the waste stream, and
- organics (green bin material for composting) would represent 23% of the waste steam.

In future project horizons, the DEIR anticipates the following:

- recyclables (blue bin) would represent 28% of the waste stream,
- MSW (black bin destined for landfill) would represent 51% of the waste stream, and
- organics (green bin material for composting) would represent 21% of the waste stream.

The EIR lacks discussion regarding the anticipated decrease in recyclable material throughput which may relate to poor expected recycling program participation. Recycling program participation levels for 3-cart set outs, according to the State of Residential Recycling, The Present and Future of Residential Recycling in the U.S., (Recycling Partnership.org, 2024), is low:

- Only 59% of American households with access to recycling use their recycling service.
- Those that do recycle only put 57% of recyclable material in their recycling containers.

Low participation rates in traditional recycling systems result in an approximate 66% loss of recyclable materials. Conversely, the existing mixed waste collection program bypasses reliance on individual compliance by processing all waste to extract recyclables. This guarantees 100% participation, which in turn ensures optimal material recovery and landfill diversion. Because the analysis fails to quantitatively compare this project against the baseline collection program—specifically regarding the reduced diversion rate and increased landfill volume—it remains deficient. Consequently, the assessment underestimates the project's environmental impacts and potential solid waste regulatory compliance issues, while preventing decision-makers and the public from understanding the project's full effects.

Response A4-12

The comment states that the Draft EIR does not adequately analyze the environmental effects of projected changes in waste stream composition, including a decrease in recyclable materials and an increase in materials sent to the landfill. The comment requests comparison of the proposed waste management approach to existing diversion practices and evaluation of the resulting impacts on landfill diversion, solid waste management, regulatory compliance, and associated environmental effects.

The comment's conclusion is based on a misunderstanding of the waste characterization information presented in the Draft EIR. The percentages presented in the Draft EIR for future planning horizons do not represent a projected decline in recycling program effectiveness, recycling participation, or material recovery rates. Rather, they reflect the anticipated composition of material delivered to and processed at the proposed RRTO based on projected future waste generation, contractual commitments, population growth assumptions, and the expected allocation of material among multiple regional facilities available to the City over the planning horizon. The estimates were developed for

facility sizing and throughput analysis and should not be interpreted as a forecast of reduced diversion performance or reduced compliance with State recycling mandates.

It should be noted that one of the project objectives is to provide the option to implement a citywide waste/recycling services three-cart set out, thereby meeting the organics and recycling diversion requirements established by Senate Bill 1383. The implementation of such a service would be expected to actually increase the recovery of recyclables and organic materials within the City by reducing the material contamination that occurs with a single bin collection system.

As described in Section 2.2.1, "Existing Operations," of the Draft EIR, the City currently generates approximately 33,000 tons per year of recyclable materials and 33,000 tons per year of organic materials, representing approximately 22 percent each of the total materials collected. Municipal solid waste accounts for approximately 56 percent of the total materials collected. Although the comment correctly cites the projected future waste composition percentages, it incorrectly compares these projections to existing operations. The Draft EIR estimates that recyclable materials processed under the future collection system would increase from approximately 22 percent to 28 percent of the waste stream, while municipal solid waste would decrease from approximately 56 percent to 51 percent. These projections do not indicate reduced recycling or increased landfill disposal.

The project would not alter the amount of recyclable or organic material generated within the City. Rather, the project would provide infrastructure necessary to process source-separated recyclable and organic materials collected through the City's state-mandated three-container collection system. Accordingly, the Draft EIR does not identify a project feature that would reasonably be expected to reduce recyclable material recovery or increase landfill disposal relative to conditions that would otherwise occur under applicable State law.

The comment references national recycling participation statistics and suggests that implementation of a three-cart collection system may result in lower recovery rates than the City's current system. However, the project is intended to comply with State requirements, including SB 1383 and applicable CalRecycle regulations (see Section 2.2.2, "Changes in Solid Waste Management Regulations," and Section 3.15, "Public Utilities"). The project is not the policy decision establishing the City's collection methodology.

Further, the Draft EIR evaluates the project's consistency with applicable solid waste regulations and landfill capacity requirements. As discussed in Section 3.15, "Public Utilities," of the Draft EIR, the project would enhance the City's capability to recover recyclable and organic materials through dedicated processing systems and provide the infrastructure necessary to manage future waste streams in compliance with State requirements. The project would not eliminate recycling opportunities, reduce diversion programs, or otherwise cause physical changes that would increase landfill disposal (see Impact 3.15-3 on pages 3.15-16 through 3.15-18).

Finally, the purpose of the waste characterization data presented in Chapter 2, "Project Description," of the Draft EIR is to establish anticipated processing demand and facility capacity needs, not to forecast future community-wide diversion rates. Because the project would not directly or indirectly cause the reduction in recyclable material recovery alleged by the comment, no additional impact analysis concerning speculative reductions in diversion or increases in landfill disposal is required.

Comment A4-13

4. The DEIR does not analyze urban decay and other reasonably foreseeable indirect socioeconomic, physical environmental and public health consequences stemming from the proposed RRTO and OWPF which are redundant to existing regional infrastructure. California courts have identified urban decay as the physical manifestation of a project's potential socioeconomic impacts and identified the need to address the potential for urban decay in environmental documents. Development of RRTO and OWPF could result in regional economic impacts that threaten public health and safety. The financial instability created by the unnecessary duplication of services threatens the regional waste management system in the following ways:

    - Threatens Essential Infrastructure and Public Health: Diverting waste streams from WPWMA's established public infrastructure will significantly dilute its revenue, jeopardizing fiscal stability and long-term viability. Undermining WPWMA's financial health could result in operational cutbacks, service disruptions, tipping fee

increases, or facility closures which could lead to unmanaged waste accumulation, illegal dumping, and severe public health, safety, and vector hazards, which the DEIR does not evaluate.

- Eliminates Regional Disposal Options: A catastrophic failure of the WPWMA system would leave County residents and the region entirely without a viable local disposal (landfill) option, increasing the risk of unmanaged waste or illegal dumping.

Response A4-13

The comment states that the Draft EIR does not evaluate potential urban decay, socioeconomic, and public health impacts associated with the proposed facilities. The comment also states that duplicating existing waste management infrastructure could weaken WPWMA's financial stability, potentially leading to service disruptions, disposal capacity losses, illegal dumping, and related public health and safety concerns.

Under CEQA, economic and social effects are not treated as environmental impacts unless they would result in a reasonably foreseeable physical change in the environment (CEQA Guidelines Sections 15064, 15131). While physical deterioration associated with urban decay may, in some circumstances, constitute an environmental impact subject to CEQA, such analysis is required only where there is substantial evidence in the record supporting a reasonable possibility that a project would cause urban decay or related physical environmental effects. As discussed below, the record does not support a reasonable conclusion that the project's potential economic impacts would result in the physical environmental impacts identified in the comment.

The project would provide an additional facility for the processing and transfer of solid waste, recyclables, and organics generated within the City and surrounding region. The project would not close existing waste management facilities, reduce permitted disposal capacity, or prevent waste generators from using existing facilities, including those operated by WPWMA. Therefore, even assuming the project could affect the distribution of waste streams among regional facilities, such changes would not, by themselves, result in a reduction of available waste management infrastructure or disposal capacity.

The physical impacts identified in the comment would depend on a chain of assumptions, including reduced waste deliveries to WPWMA facilities, resulting financial distress, service reductions or facility closures, and subsequent unmanaged waste accumulation or illegal dumping. The record does not support a conclusion that this sequence of events is reasonably foreseeable. Rather, the outcomes described in the comment would depend on uncertain future market conditions, waste flows, business decisions by independent entities, and regulatory actions that are uncertain and outside the City's control.

The project and regional waste management facilities would continue to operate within an existing regulatory framework governing solid waste handling, processing, disposal, environmental protection, and public health. The record contains no evidence that approval of the project would result in inadequate waste management capacity, interruption of disposal services, or conditions that would create a public health hazard. Moreover, because existing disposal and processing facilities would remain available to serve the region, the project would not eliminate local disposal options or create conditions that would reasonably be expected to result in unmanaged waste accumulation or illegal dumping. Absent substantial evidence supporting a reasonable foreseeability of these outcomes, CEQA does not require further analysis of the speculative economic effects identified in the comment.

Accordingly, the Draft EIR appropriately evaluates the project's reasonably foreseeable physical environmental impacts and is not required to analyze the speculative socioeconomic effects identified in the comment. Based on the record, the project would not be expected to result in urban decay, public health impacts, or other indirect physical environmental impacts described in the comment.

Comment A4-14

A Reduced-Scope Alternative is Necessary for DEIR Adequacy.

Based on the information provided in the DEIR, limiting the project scope exclusively to the Corporation Yard component would:

- Significantly reduce or entirely eliminate the project's significant and unavoidable environmental impacts.

- Resolve many areas of local controversy and address public issues raised during the environmental review period.
- Successfully meet core project objectives by providing necessary municipal infrastructure without creating unnecessary environmental burdens.

Response A4-14

The comment states that the Draft EIR should evaluate a reduced-scope alternative limited to the Corporation Yard component. The comment further states that this alternative would substantially reduce or eliminate significant environmental impacts, address community concerns and areas of controversy, and still meet the project's primary objectives.

As discussed in response to comment A4-8 regarding the alternatives analysis, the Draft EIR evaluates a reasonable range of alternatives consistent with CEQA Guidelines Section 15126.6, including the No Project Alternative, Reduced Development Area Alternative, and No On-site Compost or Biomass Operations Alternative. These alternatives were selected because they are capable of attaining most of the project objectives while reducing environmental impacts.

As further explained in response to comment A4-8, a Corporation Yard-Only Alternative was not evaluated in the Draft EIR because it would not meet most of the project's fundamental objectives, including providing an integrated location for waste, recycling, and organic materials management; supporting long-term compliance with solid waste regulations; improving operational flexibility and sustainability; and addressing future waste management service needs. In addition, the Draft EIR's alternatives analysis demonstrates that reduced-scope alternatives do not necessarily eliminate the project's significant and unavoidable impacts while still meeting the majority of project objectives. The Reduced Development Area Alternative was developed specifically to reduce environmental impacts and was identified as the environmentally superior action alternative.

Therefore, the Draft EIR evaluates a reasonable range of feasible alternatives and provides sufficient information for decision-makers and the public. No revisions to the Draft EIR are required.

Comment A4-15

In summary:

- The DEIR should be revised to fully evaluate a Reduced-Scope Alternative consisting solely of a Corporation Yard, with no RRTO, OWPF or Vendor Lease Area components.
- The DEIR should consider whether a Reduced-Scope Alternative would substantially lessen environmental impacts while meeting the project's fundamental objectives.
- If supported by the environmental analysis, the Reduced Scope Alternative should be identified as the environmentally superior and preferred alternative for decision-maker consideration.

Response A4-15

The comment requests that the Draft EIR be revised to evaluate a Reduced-Scope Alternative consisting only of the Corporation Yard and excluding the RRTO, Potential Future Organics Processing Facility, and Vendor Lease Area components. The comment states that the EIR should determine whether such an alternative would substantially lessen environmental impacts while still meeting the project's fundamental objectives and, if so, identify it as the environmentally superior and preferred alternative.

See responses to comments A4-8 and A4-14 regarding the alternatives analysis. As discussed therein, the Draft EIR evaluates a reasonable range of alternatives in accordance with CEQA Guidelines Section 15126.6, including the No Project Alternative, Reduced Development Area Alternative, and No On-site Compost or Biomass Operations Alternative. A Corporation Yard-Only Alternative was considered conceptually but was not carried forward for detailed analysis because it would not meet most of the project's fundamental objectives, including providing integrated waste, recycling, and organics management services; supporting future regulatory compliance and operational flexibility; and addressing long-term solid waste management needs.

The Draft EIR also evaluates alternatives specifically intended to reduce environmental impacts while retaining the ability to achieve most project objectives. The Reduced Development Area Alternative was identified as the

environmentally superior action alternative. Based on the analysis presented in the Draft EIR, a Corporation Yard-Only Alternative would not meet most project objectives and, therefore, was not considered a feasible alternative for detailed evaluation. Accordingly, no revisions to the Draft EIR are required.

Comment A4-16

In regard to jurisdictional boundary considerations related to this feedback, and in addition to the County's unincorporated boundary, impacts to the County's Service Area (or CSA 28) will also need to be evaluated for potential service and fiscal implications.

Response A4-16

The comment requests that the EIR evaluate potential service and fiscal impacts on County Service Area 28 (CSA 28), in addition to impacts on the County's unincorporated area, resulting from the proposed project.

CEQA requires analysis of a project's physical environmental effects. Fiscal, economic, and social effects, including potential impacts on revenues, service demand, or finances of local governmental entities such as Community Service Areas, are generally not considered environmental impacts under CEQA. CEQA Guidelines Section 15131 provides that economic and social effects of a project shall not be treated as significant effects on the environment. While economic or social effects may be considered where they are linked to a physical change in the environment, the comment does not identify, and the City is not aware of, any such physical environmental effect that would result from potential fiscal or service implications to CSA 28.

The Draft EIR evaluates potential impacts related to public services and utilities in Sections 3.14, "Public Services," and 3.15, "Public Utilities." These analyses consider the project's potential impacts on public services and utility systems, and these impacts were determined to be less than significant. The comment does not provide substantial evidence demonstrating that any fiscal or service-related effect on CSA 28 would result in a significant physical environmental impact beyond those already analyzed in the Draft EIR. Accordingly, additional analysis of fiscal or socioeconomic effects on CSA 28 is not required.

Comment A4-17

1. The City of Roseville General Plan requires coordination with neighboring jurisdictions regarding project impacts. Applicable policies include:
    a. Policy LU6.4 - To the extent feasible, coordinate land use planning and public improvements with neighboring jurisdictions.
    b. Policy LU6.5 - Encourage early consultation with adjacent jurisdictions and refer development proposals that may have an impact to these jurisdictions to the respective agencies for their review and comment. Respond and comment on development proposals in other jurisdictions that may have an impact on Roseville to minimize such impacts and ensure consistency and compatibility with existing and planned development in the City.

Response A4-17

The comment states that the City of Roseville General Plan includes policies such as Policy LU6.4 and LU6.5, supporting coordination with neighboring jurisdictions.

The City acknowledges General Plan Policies LU 6.4 and LU 6.5, which encourage coordination with neighboring jurisdictions regarding land use planning, public improvements, and development proposals that may affect those jurisdictions. The City has coordinated and continues to coordinate with Placer County and other affected agencies regarding the proposed project. Consistent with these policies, the City provided notice of the Draft EIR and opportunities for review and comment to affected agencies and jurisdictions through the CEQA process, including the Notice of Preparation and the Notice of Availability of the Draft EIR. The City also routinely coordinates with County staff on projects that may affect both jurisdictions through interagency consultation, sharing of project information, and staff-level coordination regarding land use, infrastructure, and service-related issues.

The City's circulation of the Draft EIR for public agency review and its consideration of comments received from Placer County and other agencies are consistent with the coordination and consultation objectives of General Plan Policies LU 6.4 and LU 6.5. The City has considered the comments received and has provided responses, as required by CEQA. Therefore, the project is consistent with the General Plan's policies regarding interjurisdictional coordination.

Comment A4-18

2. The County supports the PCA comment letter (submitted under separate cover) which identifies concerns with the project being built immediately adjacent to reserve properties that will be impacted by the project. The City of Roseville General Plan has policies for open space that are directly applicable as well:

    a. Policy OS1.6 - Take into account natural habitat areas when designating access to and preserving open space areas. Identify alternate locations and design for access where sensitive habitat areas have the potential to be adversely impacted.

    b. Policy OS1.8 - Maximize opportunities for preservation and maintenance of open space resources, including establishment of private open space areas. Consider coordination with non-profit organizations and investigate the potential for conservancy ownership and/or management of open space areas.

    c. Policy OS1.12 - In new development, properties adjoining open space should be oriented toward this open space in order to reduce maintenance, security, and aesthetic concerns. Not more than 50 percent of residential and non-residential properties, as measured by the length of adjoining parcel boundaries, should back up to adjacent open space.

    d. Policy LU1.5 - Promote land use patterns that result in the efficient use of urban lands and preservation of open space, as specified in the Open Space and Conservation Element.

    e. Policy LU7.6 - Encourage project designs that place a high priority and value on open space, and the preservation, enhancement and incorporation of natural resources and other features including consideration of topography, vegetation, wetlands, and water courses.

Response A4-18

The comment supports concerns raised in a separate comment letter regarding potential effects on adjacent reserve and open space properties and requests evaluation of those impacts. The comment also references applicable General Plan policies related to open space preservation, habitat protection, project design adjacent to open space areas, and coordination to preserve and maintain natural resources.

See responses to comment letter A8 from PCA regarding adjacent reserve lands. The City acknowledges the County's support of PCA's comments regarding the project's proximity to adjacent reserve properties. The project has been designed to avoid and minimize potential effects on adjacent open space and habitat resources to the extent feasible and is consistent with the intent of the cited General Plan policies.

City staff met with PCA staff in July 2026 to discuss ways to minimize potential impacts on PCA's planned preservation efforts on the Clemetson and Mourier West properties adjacent to the project site. Consistent with General Plan Policies OS1.6, OS1.8, and LU7.6, the City has considered the relationship between the project and adjacent open space resources and has incorporated measures intended to reduce the potential for conflicts between project operations and nearby open space areas. Consistent with Policy LU1.5, the project has been located on land designated for Public/Quasi-Public uses while maintaining substantial open space and conservation areas adjacent to the project site.

The project site will be closed to general public access, particularly in the areas adjacent to PCA's reserve properties, which would reduce the potential for disturbance of sensitive habitat areas consistent with Policy OS1.6 regarding protection of natural habitat areas. In addition, the project includes a sizable area south of Pleasant Grove Creek that would provide separation and buffering between project operations and the Mourier West Property. In addition, the City will implement buffers, fencing, and edge treatments to minimize the potential for litter, debris, and materials associated with facility operations to migrate onto the adjacent reserve properties (see Section 2.4.5, "Landscaping

and Security"). Lighting would be designed to minimize off-site spillover and glare onto neighboring open space areas as described in Section 2.4.5, "Landscaping and Security," and Section 3.1, "Aesthetics and Visual Resources."

As described in response to comment A3-7, although the project is not required to comply with the PCCP's Development Interface Design Requirements, the City has decided to incorporate applicable Development Interface Design Requirements identified in PCCP Section 6.3.1.2.1 into the final project design as a voluntary measure to further minimize potential indirect effects on adjacent reserve lands (this portion of the PCCP is appended to this Final EIR as Appendix A). These measures will supplement the mitigation measures already identified in the Draft EIR and will help reduce the potential for edge effects such as wildlife disturbance, lighting impacts, unauthorized access, invasive species introduction, and other indirect effects on adjacent biological resources. With incorporation of these design measures and implementation of the mitigation measures identified in the Draft EIR (as revised in the Final EIR), the project's potential indirect impacts on adjacent biological resources would be avoided or minimized.

Further, the City is committed to continued coordination with PCA during project design and implementation and will share design details with PCA as the project progresses so that opportunities to avoid or minimize potential conflicts with adjacent reserve lands can be identified and addressed. The City will also continue to evaluate appropriate edge treatments, screening, and operational measures adjacent to reserve areas which is consistent with Policies OS1.8 and LU7.6 encouraging preservation of open space resources and incorporation of natural resource considerations into project design.

The comment also cites Policy OS1.12, regarding the orientation of development adjacent to open space. The project site is designated for public/quasi-public uses and is not a residential subdivision. Accordingly, Policy OS1.12 is of limited applicability to the project. Nevertheless, the project incorporates buffers, landscaping, fencing, lighting controls, and operational measures intended to reduce maintenance, security, aesthetic, and compatibility concerns along project boundaries adjoining open space and reserve lands (see Section 2.4.5, "Landscaping and Security," in the Draft EIR). Therefore, the project is consistent with the intent of the cited General Plan policies.

Comment A4-19

3. Materials recovery facilities have the potential to create significant odor issues. Potentially applicable mitigation measures should be considered:
    a. Ongoing system-wide assessments;
    b. Greater use of odor reducing agents;
    c. Incorporation of odor masking agents during the use of misters;
    d. Improvements to, and scaling up of, aerated static pile composting;
    e. Visual and wind break barriers;
    f. Community Education, Odor Response Network, and Neighborhood Monitoring;
    g. General odor controls, such as tree lines, meteorological monitoring, odor monitoring; and
    h. Dedicating Authority personnel to ongoing odor inspection, management and supervision.

Response A4-19

The comment expresses concern that materials recovery and composting operations could generate odors and recommends consideration of additional odor-control measures, which appear to be those applied to the WPWMA, a mixed waste facility and landfill with more exposed waste than this project would include. As described on pages 3.3-39 and 3.3-40 of the Draft EIR, Mitigation Measure 3.3-5 requires specific operational and engineering controls for all identified odor-generating sources, ongoing odor monitoring and adaptive management including routine patrols under specific meteorological conditions, adaptive management triggers, and installation of odor sensors throughout the site. In addition, this measure requires increased monitoring and patrol frequency if routine monitoring indicates that applicable controls are not met.

In response to other comments (including from PCAPCD), Mitigation Measure 3.3-5 has been revised as shown in Chapter 3, "Revisions to the Draft EIR," of this Final EIR. Mitigation Measure 3.3-5 provides flexibility to incorporate additional engineering and operational controls as warranted based on facility design, operational experience, regulatory requirements, and observed odor conditions. The mitigation measure is intentionally performance-based and requires the Odor Reduction Plan to identify and implement specific operational and engineering controls appropriate to the final facility design and operations and their associated odors. The final facility design and operating procedures would also be subject to review and approval by PCAPCD and other applicable regulatory agencies as part of the permitting process.

The comment does not demonstrate that mitigation measures beyond those already incorporated into Mitigation Measure 3.3-5, as revised, are necessary to reduce odor impacts to a less-than-significant level. Therefore, no further revisions are required in response to this comment.

Comment A4-20

4. Screening – the facility should incorporate screening features – berms, landscaping, walls – to protect future County residents that live next to it.

Response A4-20

The comment requests that the project incorporate screening features, such as berms, landscaping, and walls, to help buffer and screen project operations from future adjacent County residential development.

As described on page 2-19 of the Draft EIR, the project incorporates perimeter landscaping, setbacks, and fencing to provide buffering and visual screening between project operations and surrounding land uses. Landscape setbacks and fencing would be provided along the perimeter of the site, including along Phillip Road and Pleasant Grove Creek, and new landscaping would comply with the City's Water Efficient Landscape Ordinance. Perimeter and internal fencing would generally consist of six-foot-tall chain-link fencing or equivalent, and additional screening may be installed where appropriate.

Section 3.1, "Aesthetics and Visual Resources," of the Draft EIR also explains that landscaping would soften views of the site and provide a buffer between the project and neighboring uses. In addition, project facilities would be designed to be visually compatible with surrounding and planned development areas and would be required to comply with applicable Roseville General Plan policies and the City's Community Design Guidelines. Project design features would include a coordinated color palette, articulated building walls, architectural treatments on public-facing elevations, and screened mechanical equipment. The Community Design Guidelines also include standards for landscaping, screening, and lighting to enhance visual quality and reduce impacts on adjacent properties. See discussion of Impact 3.1-1 for additional details.

Accordingly, the project already incorporates screening and visual buffering measures intended to reduce visual impacts on adjacent existing and future land uses. No revisions to the Draft EIR are required.

Comment A4-21

5. If oak woodland will be removed, the City must comply with City of Roseville General Plan policy:

    a. **Policy LU7.8.** - The location and preservation of native oak trees and oak woodlands shall be a primary factor in determining site design, building location, grading, construction and landscaping, and in establishing the character of projects through their use as a unifying element in both new and existing development.

Response A4-21

The comment states that if the project would remove oak woodland resources, the City must comply with General Plan Policy LU 7.8, which requires that the location and preservation of native oak trees and oak woodlands be a primary consideration in site design, building placement, grading, construction, landscaping, and overall project design.

To the extent individual oak trees may be affected during final design or construction, the City would comply with applicable City policies and requirements regarding the protection, avoidance, minimization, and mitigation of impacts to native oak trees, including General Plan Policy LU 7.8 and any applicable tree preservation requirements.

Since publication of the Draft EIR, tree surveys were conducted in May 2026 to document existing tree resources within and adjacent to the project study area, evaluate tree condition and structural characteristics, identify trees that may qualify for protection under applicable City regulations, and provide planning-level information regarding potential tree constraints and opportunities for preservation (Helix Environmental Planning 2026). Based on the survey results, Impact 3.5-6 has been revised to reflect the existing tree resources within the study area. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes.

Section 2.5, "Project Construction," of the Draft EIR states that "construction would comply with the City's tree mitigation policy if protected trees are identified in any of the construction areas." As project design advances, the City would seek opportunities to avoid and minimize impacts on existing trees where practicable, with priority given to the preservation of mature native oak trees. Any protected oak trees affected by project implementation would be subject to the City's tree protection and mitigation requirements. Accordingly, the project is consistent with the intent of Policy LU 7.8.

Comment A4-22

6. Future adjacent residents should be protected for light/glare. The Roseville General Plan policy addresses lighting with the following policies:
    a. Policy LU7.9 - Control artificial lighting to avoid spill-over lighting onto adjacent properties. Use anti-reflective architectural materials and coatings to prevent glare.

Thank you again for the opportunity to review and comment and we are happy to meet with you to discuss our comments.

Response A4-22

The comment requests that future residents adjacent to the project be protected from light and glare impacts and cites General Plan Policy LU 7.9, which requires artificial lighting to be controlled to avoid spillover onto adjacent properties and the use of anti-reflective architectural materials and coatings to prevent glare.

As described under Impact 3.1-2 in the Draft EIR, the project would be required to adhere to the California Energy Code and Green Building Regulations, Title 24 Outdoor Lighting Standards, and General Plan Policy LU7.9 to reduce light spillage and glare on adjacent properties and in private spaces. Further, Mitigation Measure 3.1-2 (Minimize Potential Sources of Light and Glare) would require the City to implement design standards to minimize potential sources of light and glare, which include the use of cutoff type light fixtures, restrictions on the height of pole mounted lighting, and the use of nonreflective surfaces for new structures. The Draft EIR concludes that adherence to these standards and compliance with applicable regulations would limit impacts such that skyglow and light spillage would not substantially increase beyond existing conditions, resulting in a less-than-significant impact.

Letter A5 Placer County Air Pollution Control District

Yushuo Chang, Planning & Monitoring Section, Supervisor
June 22, 2026

Comment A5-1

The Placer County Air Pollution Control District (District) thanks you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the Roseville Environmental Utilities Operations Center Project (Project) for your consideration. The District has the following comments.

1. In subsection 2.4.3 under the Vendor Lease Area on page 2-18 it is mentioned that the current buildings on site could be renovated for use by prospective vendors.

The demolition or remodeling of any structure may be subject to the National Emission Standard for Hazardous Air Pollutants (NESHAPS) for asbestos, which may include inspection for the presence of asbestos by a certified asbestos inspector and mediation or removal of asbestos materials prior to demolition activity and notification and surveys be provided to the U.S. EPA. The District recommends that related demolition or remodeling activities to be comply with

the above U.S.EPA requirements. More information on Asbestos in Building Materials along with contact information can be found on the District's website at https://www.placerair.org/1598/Asbestos-in-Building-Materials

Response A5-1

The comment states that any demolition or renovation of existing buildings proposed for vendor use may be subject to US EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements for asbestos. The comment recommends that project-related demolition or remodeling activities comply with applicable asbestos inspection, notification, abatement, and removal requirements. The City will comply with all applicable federal, state, and local regulations pertaining to asbestos-containing materials, including the NESHAP requirements administered by the US EPA. Prior to any demolition or renovation activities, required asbestos inspections, notifications, and abatement measures, if necessary, would be conducted in accordance with applicable regulations. Compliance with these requirements is mandated by law and would ensure that potential impacts associated with asbestos are appropriately addressed. No changes to the analysis or conclusions of the Draft EIR are required.

Comment A5-2

2. Under Section 3.3-1 "PCAPCD Rule 228 Fugitive Dust" on page 3.3-17, the DEIR lists the provision of Section 104 "Partial Exemptions". Please note that only specific equipment which requires a permit from the PCAPCD would be exempt from Rule 228, not the complete facility. The two exemptions of the Section 104 exemptions would apply only to the proposed Project operations which are independently and separately under a District operating permit.

Response A5-2

The comment states that the Draft EIR's discussion of PCAPCD Rule 228 (Fugitive Dust) should clarify that the exemptions listed in Section 104 (Partial Exemptions) apply only to specific equipment operating under a PCAPCD permit and do not exempt an entire facility from Rule 228 requirements. The comment states that any exemption would apply only to those project operations that are independently and separately regulated under a PCAPCD operating permit. The project would be required to comply with all applicable PCAPCD rules and regulations, including Rule 228 and any other requirements governing construction and operational activities. Any exemptions provided under Rule 228 would apply only as specified by PCAPCD and would not exempt the project as a whole from applicable fugitive dust control requirements. Compliance with PCAPCD rules and permitting requirements would be addressed during project implementation, as applicable. The comment does not alter the conclusions of the air quality analysis in the Draft EIR, and no revisions to the impact analysis are required.

Comment A5-3

3. Under Impact 3.3-5 Create Objectionable Odors Affecting a Substantial Number of People while there may be temporary diesel exhaust emissions during construction, there can be diesel exhaust emissions during operation during both Phase 1 and 2, along with other odors from the facility operations. With some homes in the vicinity of the proposed facility, it should be noted that objectionable odors investigations will occur, by the PCAPCD, regardless if a substantial number of people are affected. Each individual odor compliant would be investigated by the District.

Response A5-3

The comment states that, in addition to temporary diesel exhaust emissions during construction, the project could generate diesel exhaust and other odors during both Phase 1 and Phase 2 operations. The commenter further states that PCAPCD investigates all odor complaints, regardless of whether a substantial number of people are affected. As discussed in the Draft EIR, odor impacts were evaluated in accordance with CEQA significance criteria, including whether the project would create objectionable odors affecting a substantial number of people (see Impact 3.3-5 beginning on page 3.3-34). As summarized on page 3.3-9 of Section 3.3, "Air Quality," of the Draft EIR, because existing sensitive uses are located within PCAPCD-screening distances and because future sensitive uses are planned within these distances, the Draft EIR determined that there would be a potential for the project to cause objectionable odors during operations.

Mitigation Measure 3.3-5 requires the City to prepare, implement, and maintain a comprehensive Odor Reduction Plan to minimize the potential for objectionable odors affecting nearby sensitive receptors. The Odor Reduction Plan would be established for the life of project operations and designed to address all odor sources. With specific odor control measures in place, off-site odor emissions would be limited and controlled. In response to other comments (including comments from PCAPCD), Mitigation Measure 3.3-5 has been revised, as shown in Chapter 3, "Revisions to the Draft EIR," of this Final EIR. As revised, Mitigation Measure 3.3-5 provides flexibility to incorporate additional engineering and operational controls as warranted based on facility design, operational experience, regulatory requirements, and observed odor conditions. The mitigation measure is intentionally performance-based and requires the Odor Reduction Plan to identify and implement specific operational and engineering controls appropriate to the final facility design, operational characteristics, and associated odor sources. The final facility design and operating procedures would also be subject to review and approval by PCAPCD and other applicable regulatory agencies as part of the permitting process, including incorporation of applicable permit conditions related to odor control.

In addition to compliance with Mitigation Measure 3.3-5, as revised, the City will comply with all applicable PCAPCD rules, regulations, permit conditions, and operational requirements related to air quality and odor control. The City also recognizes that PCAPCD investigates odor complaints on a case-by-case basis regardless of the number of individuals affected. The comment does not demonstrate that mitigation measures beyond those already incorporated into Mitigation Measure 3.3-5, as revised, are necessary to reduce odor impacts to a less-than-significant level. Accordingly, no further revisions are required in response to this comment.

Comment A5-4

4. On page 3.3-32 under "Operations", the 2nd sentence describes that "Full operation would include the maximum anticipated waste throughput of 660,00 tpy of waste, including 210,000 tpy of organics". The District believes that the anticipated waste throughput should be 660,000 and not 660,00 tpy. Please correct it.

Response A5-4

The comment identifies a typographical error in the Draft EIR on page 3.3-32 under the "Operations" discussion. Specifically, the comment states that the maximum anticipated waste throughput is stated as "660,00 tpy" and recommends correcting the value to "660,000." This text has been revised to correct the typographical error. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes.

Comment A5-5

5. On page 3.3-32, "Combined Construction and Operations" describes that the modeling inputs assuming that 90 percent of traffic would move west from the site, while 10 percent heads east. Figure 7 and 8 in Appendix E "Transportation Supporting Data and Calculations" shows that the Project's trip distribution would be 90 percent of traffic moving to east from the site and 10 percent heads west. This appears to be a typo and the District recommends revisiting the traffic assumptions for the HRA modeling analysis to ensure it is consistent with the Project's traffic analysis.

Response A5-5

The comment identifies a potential discrepancy between the traffic distribution assumptions used in the health risk assessment (HRA) and those shown in Appendix E and recommends verifying that the HRA modeling is consistent with the project's traffic analysis. The HRA modeling used the correct project traffic distribution assumption, which reflects that approximately 90 percent of project-related traffic would travel east of the site and 10 percent would travel west, consistent with the project's traffic analysis presented in Appendix E of the Draft EIR. The statement in the Draft EIR indicating that 90 percent of traffic would travel west and 10 percent east is a typographical error. This clarification does not affect the HRA results or the conclusions of the air quality analysis. This text has been revised to correct the typographical error. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes.

Comment A5-6

6. On page 3.3-39, under the Mitigation Measure 3.3-5 "Implement Facility Odor Reduction Plan", the second bullet under "Receiving and material recovery building requirements" states that the exhaust gas ventilation filtering system. Please note that these proposed mitigation components would require a District operating permit.

Response A5-6

The comment states that the exhaust gas ventilation filtering system identified in Mitigation Measure 3.3-5 for odor control would require an operating permit from PCAPCD. Mitigation Measure 3.3-5 identifies examples of potential odor control measures that may be implemented, as appropriate, to minimize odor emissions from project operations. To the extent any odor control equipment or associated project operations are subject to PCAPCD permitting requirements, the City will obtain all required permits and comply with applicable PCAPCD rules, regulations, and permit conditions. The comment does not identify an inconsistency in the environmental analysis or mitigation measure, and no changes to the Draft EIR are required.

Comment A5-7

7. On page 3.3-40, under "Odor monitoring, complaints and adaptive management", the first sentence states that the City shall implement corrective actions for odor control within 7 days. The District recommends the City shall act as soon as possible in conjunction with the District's cooperation.

Response A5-7

The comment states that Mitigation Measure 3.3-5 requires corrective actions for odor control to be implemented within 7 days when monitoring indicates applicable controls are not being met. The comment recommends that the City take corrective action as soon as possible and coordinate with PCAPCD in responding to odor issues.

In response to other comments (including comments from PCAPCD), Mitigation Measure 3.3-5 has been revised, as shown in Chapter 3, "Revisions to the Draft EIR," of this Final EIR. As revised, Mitigation Measure 3.3-5 requires implementation of an Odor Reduction Plan and establishes procedures for odor monitoring, complaint response, adaptive management, and corrective actions. Mitigation Measure 3.3-5 continues to establish a maximum timeframe for implementing corrective actions and does not preclude the City from responding more quickly when warranted. The City intends to investigate and address odor issues as promptly as practicable and will coordinate with PCAPCD, as appropriate, regarding odor complaints and corrective measures. As revised, Mitigation Measure 3.3-5 provides a clear and enforceable framework for odor monitoring, response, and corrective action. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes.

Comment A5-8

8. On page 3.3-41, the fifth bullet point mentions a wastewater pond. Is this the same as the leachate or compost water basins mentioned on page 2-24 under Stormwater Management? The District recommends adding additional description for it.

Response A5-8

The comment states that the fifth bullet on page 3.3-41 references a wastewater pond and asks whether it is the same feature identified as the leachate or compost water basins described under the Stormwater Management section on page 2-24. The comment recommends providing additional description of the feature. The term "wastewater pond" on page 3.3-41 of the Draft EIR is used in the context of the Odor Impact Minimization Plan (OIMP) requirements contained in CCR Title 14, Section 17863.4, which identifies "wastewater pond controls" as an example of an odor management measure that may be applicable at composting facilities. For the proposed project, this term is intended generically to encompass any water management features associated with organics processing that could have odor-generating potential, such as leachate collection, contact water management, or similar process-water storage and handling facilities. It does not identify a separate project feature beyond those described in Chapter 2, "Project Description," of the Draft EIR. Accordingly, no changes to the Draft EIR are required.

Comment A5-9

9. The Proposed Project includes several components that will need stationary source permits from the District. However, the DEIR does not include discussion for the District's permitting program. Please update the discussion within Section 3.3.1 Regulatory Setting under "Local" for "Placer County Air Pollution Control District" to include additional District's rules applicable to the Proposed Project:

   Rule 214, Transfer of Gasoline into Stationary Storage Containers Rule 501, General Permit Requirements

   Rule 502, New Source Review

   Rule 503, Emission Statement

   Rule 507, Federal Operating Permit Program

Response A5-9

The comment states that the project would require stationary source permits from PCAPCD and states that the Draft EIR's discussion of the local regulatory setting should be updated to include additional applicable PCAPCD permitting requirements and rules. The regulatory setting discussion in Section 3.3.1 of the Draft EIR has been revised to include descriptions of PCAPCD Rule 214, Rule 501, Rule 502, Rule 503, and Rule 507, as recommended. These rules govern PCAPCD permitting requirements, new source review procedures, emissions reporting, and federal operating permit requirements for applicable stationary sources. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes.

The City recognizes that certain project components may require permits from PCAPCD and will comply with all applicable PCAPCD rules, regulations, permit requirements, and permit conditions in effect at the time of project implementation. Compliance with applicable permitting requirements is required by law and would occur during project design, permitting, construction, and operation, as appropriate. The addition of these rules to the regulatory setting provides further context regarding the applicable regulatory framework but does not alter the air quality analysis or conclusions of the Draft EIR.

Comment A5-10

10. On page 3.3-9, the DEIR states that "PCAPCD also adopted the 2014 Reasonably Available Control Technology (RACT) State Implementation Plan Analysis and federal Negative Declarations for 16 Control Technique Source Categories." It was prepared to satisfy the planning requirement for meeting the 2008 federal 8-hour ozone standard (0.075 ppm). Another RACT SIP was adopted by the PCAPCD Board in 2020 to satisfy the planning requirement for the 2015 federal 8-hour ozone standard (0.070 ppm). Please update the discussion with corrective information.

Response A5-10

The comment states that the Draft EIR references PCAPCD's 2014 Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Analysis, which was prepared to address the 2008 federal 8-hour ozone standard. The comment states that PCAPCD subsequently adopted a 2020 RACT SIP to satisfy planning requirements for the more stringent 2015 federal 8-hour ozone standard and recommends updating the regulatory setting discussion accordingly. The Draft EIR has been revised to update the discussion of PCAPCD's RACT SIP Analysis to reflect the adoption of the 2020 RACT SIP, which was prepared to satisfy planning requirements associated with the 2015 federal 8-hour ozone standard. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes. This revision will ensure that the regulatory setting discussion reflects the current air quality planning framework. The updated information does not affect the air quality analysis, significance determinations, or conclusions presented in the Draft EIR.

Comment A5-11

11. On page 3.3-19 "Biomass Gasification Facility", it proposes a future biomass facility which could be a 2.5 MW facility and an annual throughput of biomass fuel of 30,000 tons is assumed in the modeling. The DEIR does not specify where these biomass fuels originate from (where grown and harvested and have to be transported from). Appendix C "Operational On-Road Vehicle Emissions Phase 2" assumes the one-way trip length for fuel trick is

27.2 miles. The District is concerned that this trip length is experientially underestimated as the origin of the biomass fuel could be at a location much further away from the project.

In addition, Appendix C also assumes 208 separate one-way trips per year to deliver 30,000 tons of biomass fuel. Based on this assumption, each truck trip will deliver approximately 144 tons of biomass fuel. This substantially exceeds the possible loading capacity for a heavy-heavy duty truck. The District recommends the DEIR to re-verify these modeling assumptions and may need to recalculate the related on-road criteria pollutants and GHG emissions from fuel trucks for the proposed biomass facility in Phase 2.

Response A5-11

The comment questions the assumptions used to model biomass fuel deliveries for the potential future biomass gasification facility, including the assumed truck trip length and number of annual truck trips, and recommends verifying whether the transportation assumptions and resulting air quality and greenhouse gas emissions estimates are appropriate.

The biomass fuel source evaluated for the potential future biomass gasification facility consists primarily of locally generated green waste (yard waste) collected from City residents and commercial customers. As such, the fuel source is not anticipated to be transported from distant agricultural or forestry operations. The one-way haul distance of approximately 27.2 miles used in Appendix C of the Draft EIR reflects the local collection and transfer characteristics associated with the City's service area and is considered a reasonable and representative assumption for this conceptual analysis. Because the biomass feedstock originates from local residential and commercial green waste streams, substantially longer transportation distances are not anticipated. The Final EIR has been revised to describe the anticipated origin of the biomass fuel. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes.

With respect to annual fuel quantities, the Draft EIR assumes an annual biomass fuel throughput of approximately 30,000 tons per year. The emissions analysis did not assume truck payloads of 144 tons per trip. Rather, Appendix C and associated emissions modeling is based on truck trip estimates assuming a 9-ton capacity truck, which is within the range of typical loading conditions for green waste collection and transfer vehicles. Biomass would enter the facility using the same City fleet required to bring in all solid waste. The project would not result in additional truck trips dedicated to hauling in biomass fuel.

PCAPCD's calculation appears to be based on the assumption that the 208 annual truck trips identified in Appendix C represent all truck trips associated with biomass fuel delivery. However, the table referenced in Appendix C (PDF page 33 of 180) presents multiple categories of truck activity, including material trucks, fuel trucks (note that these trucks are delivering petroleum [diesel, gasoline, etc.] to energize the on-site equipment and not "wood fuel"), and employee-related vehicle trips. The operational emissions modeling account for the full range of vehicle activity assumptions identified in the appendix and do not rely on a 144-ton payload assumption for fuel deliveries

Therefore, the Draft EIR's transportation and emissions analysis for the conceptual biomass gasification facility was based on locally sourced biomass feedstock, reasonable haul distances representative of the City's service area, and truck loading assumptions that are consistent with the characteristics of green waste transport. Consequently, the comment does not identify an error in the emissions analysis, and no revisions to the air quality or GHG calculations are required.

Comment A5-12

12. Appendix C "Onsite Material Process Emissions" estimates the on-site equipment used for proposed material transfer station and compost facility. However, it does not include the emission estimation from possible on-site activities for the potential biomass facility. Although there is an uncertainty whether the facility could be built, the DEIR analysis does include the emission estimations of potential criteria pollutants and GHG emissions from the facility. The District recommends that the "Onsite Material Process Emissions" include possible emission estimations from offroad equipment used for the proposed biomass facility.

Response A5-12

The comment states that the emissions analysis does not include estimates of emissions from off-road equipment that could be associated with the potential future biomass gasification facility and recommends that such emissions be included in the on-site equipment emissions analysis.

The comment correctly observes that Appendix C of the Draft EIR identifies off-road equipment associated with the Material Transfer Station and Compost Facility and does not separately identify equipment assigned exclusively to the Potential Future Biomass Facility. However, the operational emissions analysis did account for off-road equipment used to manage organic materials processed at the Potential Future Organics Facility, including the potential future biomass processing component. For purposes of the air quality and GHG analysis, equipment associated with handling organic materials was included under the Compost Facility assumptions rather than being modeled as a separate equipment fleet for the Biomass Facility. Specifically, the analysis included the following off-road equipment (see Appendix C [PDF page 54 of 180] of the Draft EIR):

- Material Transfer Station: 8 front-end loaders and 5 forklifts.
- Organics Processing Area (Future Potential Compost Facility and/or Biomass Facility): 10 front-end loaders and 2 water trucks.
- Collector/Transfer Trucks: Annual trips apportioned to on-site travel activity.

The 10 front-end loaders and 2 water trucks modeled for organics processing were intended to support management of organic materials at the overall Potential Future Organics Processing Facility, including both composting operations and the biomass processing operations. Therefore, emissions associated with the off-road equipment necessary to handle biomass feedstock were already incorporated into the operational emissions analysis and were not omitted from the modeling. Because the analysis conservatively accounted for off-road equipment associated with processing organic materials, including biomass feedstock, the Draft EIR does not underestimate operational emissions associated with the Potential Future Biomass Facility. No revisions to the criteria pollutant or GHG emissions analysis are required.

Comment A5-13

13. According to the DEIR analysis, the proposed organic process facility and biomass facility would result in substantial ROG and NOx emissions, respectively. The total annual ROG emissions from the organic process facility and total annual NOx emissions from the biomass facility would exceed 25 tons per year and become federal major stationary sources subject to the requirement for the federal operating permit (Title V permit), which is additional to the PCAPCD's operation permit. Please note that there are only four Title V facilities in Placer County. The District recommends Impact 3.3-1 "Conflict with or Obstruct Implementation of the Applicable Air Quality Plan" should include the discussion if these two potential Title V facilities proposed by the project would result in the difficulties for the Sacramento federal ozone nonattainment area to achieve attainment of federal 2015 ozone standard.

Response A5-13

The comment states that emissions from the proposed organics processing facility and potential biomass facility could exceed federal Title V major source thresholds and recommends evaluating whether these facilities could affect attainment of the federal 2015 ozone standard in the Sacramento ozone nonattainment area. The Draft EIR has been revised to include additional discussion of federal Title V operating permit requirements in Impact 3.3-1. The revised text clarifies that, depending on final facility design and emissions, the Potential Future Organics Processing Facility and/or Potential Future Biomass Gasification Facility could be subject to federal Title V permitting requirements. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes.

As revised, Impact 3.3-1 explains that the potential applicability of a Title V permit does not, by itself, indicate that the project would conflict with or obstruct implementation of the Sacramento 2015 Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan. The revisions do not alter the impact analysis or significance determination. The impact remains less than significant.

Comment A5-14

14. The DEIR Section 3.4.3 refers to applying the District's recommended GHG significance thresholds for stationary source projects to determine the project's GHG emission impact. Please note that the District's recommended bright-line threshold of 10,000 MTCO2e/year is to consider the complete project's related GHG emissions from non-biogenic and biogenic sources. Accordingly, the significance determination is not based on whether the project would result in a net increase from fossil-based GHG emissions.

    The District does not oppose if the DEIR would apply the net-increase concept to discuss the project's related GHG emission impacts. If so, the District recommends that the DEIR include further discussion to define the baseline condition to the proposed compost operation and biomass facility to analyze if the related operation would result in a net increase in GHG emissions. For example, the baseline discussion for the biomass facility can be if the feedstock would be biomass waste that can be removed from the forested lands to avoid on-site open pile burning or how much fossil-based electricity can be substituted by the electricity generated from the proposed biomass facility.

Response A5-14

The comment states that PCAPCD's recommended 10,000 $MTCO_2e$/year significance threshold applies to total project GHG emissions, including both biogenic and non-biogenic sources. The comment further recommends that, if the Draft EIR uses a net-increase approach to evaluate greenhouse gas impacts, it should provide additional discussion of the applicable baseline conditions and the extent to which the potential future composting and/or biomass facilities could reduce emissions through activities such as organic waste diversion, avoided biomass burning, or displacement of fossil fuel-based energy generation.

The City acknowledges PCAPCD's recommendation. However, the Draft EIR's evaluation of GHG emissions is based on the CEQA principle that significance is determined by comparing project emissions to existing environmental conditions. CEQA Guidelines Section 15125(a) requires that an EIR evaluate a project's impacts compared to the existing physical environmental conditions that constitute the baseline for environmental analysis. Likewise, the California Supreme Court has held that the normal CEQA baseline consists of existing physical conditions rather than hypothetical future scenarios (*Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Cal.4th 310).

The use of a no-net-increase approach for evaluating GHG emissions is also consistent with applicable CEQA guidance and case law. For example, the California Supreme Court's decision in *Center for Biological Diversity v. California Department of Fish and Wildlife* (2015) 62 Cal.4th 204 (*Newhall Ranch*) recognized that lead agencies have discretion to use a no-net-increase threshold, where appropriate, for evaluating GHG impacts. Similarly, the California Air Resources Board's 2022 Climate Change Scoping Plan identifies a no-net-increase approach as one acceptable framework for evaluating GHG emissions. Under this approach, biogenic carbon emissions are not considered to contribute to a project's significant GHG impact because they are part of the natural carbon cycle and do not represent a net increase in atmospheric GHG. Thus, this approach considers only the GHG emissions solely attributable to the project itself that result in a new increase in non-biogenic emissions that may lead to adverse environmental effects relating to climate change. For the proposed project, carbon contained within woody biomass was previously sequestered during vegetation growth and would ultimately be released to the atmosphere through natural decomposition or other disposal methods, such as open burning or landfilling, with or without the proposed project. Accordingly, the GHG analysis focuses on emissions that represent an additional anthropogenic contribution to atmospheric GHG concentrations relative to existing conditions.

PCAPCD's suggested comparison of project emissions to other potential future biomass management scenarios, such as avoided forest pile burning or displacement of fossil fuel-based electricity generation, could provide additional context regarding the potential environmental benefits of the proposed composting or biomass facilities. However, such a comparison is not required for determining significance under CEQA. Pursuant to CEQA Guidelines Section 15125(a), project impacts are evaluated against the existing environmental baseline rather than speculative future conditions or alternative waste management scenarios. In addition, sufficient information is not currently available to reliably determine how biomass feedstocks would otherwise be managed or the extent to which future electricity

generation from a biomass facility would offset fossil fuel-based generation. Therefore, while PCAPCD's recommended discussion may be informative, it is not necessary to support the Draft EIR's significance determination. The significance conclusion appropriately relies on a comparison of project emissions to existing baseline conditions, consistent with CEQA.

Comment A5-15

15. Appendix C "Biomass Gasifier Emissions" presents the calculation for criteria pollutants and GHG emissions from the biomass gasification facility. The calculation cited emission factors from a recent environmental document prepared for the Tuolumne Biomass Utilization Project. The GHG results were lower than we would expect and significantly lower from previous environmental documents prepared by Ascent for the Placer Cabin Creek biomass energy facility, which proposed a similar gasification system to generate electricity from biomass waste. Since no additional information is cited in the Tuolumne Biomass Project's environmental document, the District would like to request the information regarding the emission factors as the reference for future possible permit application evaluation.

Response A5-15

The comment questions the GHG emission factors used for the potential biomass gasification facility, noting that the resulting emissions estimates appear lower than those reported for similar biomass gasification projects. The comment requests additional information regarding the emission factors used in the analysis to support future permit review and evaluation.

As shown on PDF pages 45 through 50 of Appendix C of the Draft EIR, GHG emissions associated with the future potential gasification facility were based on anticipated annual biomass tonnage (i.e., 30,000 tons per year) and calculated emissions associated with operation of a biomass gasification unit using syngas, as well as potential maintenance activities using coal-power to run the gasification unit. Emissions factors were obtained from another surrogate biomass facility project in Tuolumne County, as cited in Appendix C of the Draft EIR. The surrogate facility assumes that syngas would power the gasification unit and that coal could be used to power the facility for regular maintenance testing. In addition, it assumed the inclusion of a dryer to dry the biomass and a combined heat and power engine. At the time the Draft EIR was prepared, no specific technology for the future potential biomass facility had been determined, due to the programmatic nature of this project component. Further, it is likely that by the time the future biomass facility is proposed for development, available technology may vary from what is existing or available today. Accordingly, the analysis provides a reasonable estimate of emissions for a potential future biomass facility using known existing technologies, that may be representative of what could be developed.

All notes and citations are included on page 50 of Appendix C of the Draft EIR. Considering the programmatic nature of the future potential gasification facility, there are no other site-specific emissions factors or emissions sources that the Draft EIR could consider. In the future, if the gasification system is proposed for development, a site-specific and design-level HRA and/or emissions analysis would be required, in accordance with Mitigation Measure 3.3-3b and CEQA requirements that trigger subsequent review when relying on programmatic analyses. No further analysis or modeling is necessary for this Draft EIR.

Comment A5-16

16. The District conducted an independent Health Risk Assessment of the Phase II operations (including all stationary sources and associated mobile sources) using the methods and modeling assumptions prepared by the DEIR's HRA. Our risk modeling results show that the potential risk is slightly higher than 10 in a million. The District recommends that the DEIR revisit the associated modeling setting and assumptions to ensure the results are still reasonable to present the project's related risk. If needed, additional mitigation measures should be identified.

Response A5-16

The comment states that PCAPCD conducted an independent HRA for Phase 2 operations using the methods and assumptions described in the Draft EIR and obtained a cancer risk estimate slightly above 10 in one million. Based on these results, the comment recommends that the City revisit the HRA modeling assumptions and determine whether additional mitigation measures may be warranted. However, the independent HRA prepared by PCAPCD was not

provided to the City and, therefore, the City cannot evaluate the modeling inputs, assumptions, methodologies, or results used in that analysis, nor can it determine the basis for any differences between PCAPCD's results and those presented in the Draft EIR.

As discussed on a July 21, 2026 conference call with the City and PCAPCD staff, HRAs involve numerous technical assumptions and professional judgments related to emission rates, source characteristics, meteorological data, receptor placement, and dispersion modeling. As a result, it is not uncommon for different qualified practitioners to obtain somewhat different results when evaluating the same project. The HRA presented in the Draft EIR was prepared using accepted methodologies and the best available project information at the time of analysis. All methods, emissions factors, and model inputs are explained in Section 3.3.3, "Environmental Impacts and Mitigation Measures," under the subheading, "Methodology," and contained in greater detail in the HRA memo included as Appendix B of the Draft EIR.

Absent the PCAPCD's independent HRA and supporting documentation, the City is unable to assess whether the differences identified by the comment are attributable to alternative assumptions, modeling parameters, or other methodological considerations. Further, additional comments by PCAPCD pertaining to specific model inputs and parameters used, some of which suggested that inputs were underestimated. See responses to comments A5-11, A5-12, A5-15, and A5-17 explaining the inputs and assumptions used in response to those comments and how emissions were not underestimated. Accordingly, the comment does not provide substantial evidence demonstrating that the Draft EIR analysis is inaccurate or that additional mitigation is required. Therefore, no changes to the analysis or conclusions of the Draft EIR are warranted.

Comment A5-17

17. The Operational Fleet Maintenance source type, shown in Table 2 of Appendix B 1-HRA, is mistakenly listed as an "Area" source. Fleet Maintenance activities typically involve two primary emission types: 1) indoor shop emissions escaping through building openings and 2) outdoor mobile/idle emissions from heavy equipment or trucks moving around the yard. The District recommends that these sources for modeling analysis be a "Volume" source, per Bay Area Air District 2022 CEQA Guidelines.

Response A5-17

The comment states that the Operational Fleet Maintenance source identified in the HRA is modeled as an "Area" source and recommends that it instead be modeled as a "Volume" source. The comment states that fleet maintenance activities typically involve emissions from indoor shop activities and outdoor vehicle and equipment movements and refers to Bay Area Air District CEQA guidance as support for using a volume source representation.

The HRA modeling approach was developed by qualified air quality professionals using accepted HRA methodologies and modeling assumptions appropriate for the available project information. Selection of source types for dispersion modeling requires professional judgment and may vary depending on the nature of the emission source, the level of detail available, and the objectives of the analysis. The use of an area source is acceptable for various sources modeled (e.g., equipment use, buildings) because the precise footprint or location of equipment use is not known at a level-of-detail to accurately pinpoint the emission source.

The comment does not provide modeling results or technical evidence demonstrating that use of an area source for the Operational Fleet Maintenance emissions materially understates health risks or changes the conclusions of the HRA. It is not uncommon for qualified practitioners to employ different modeling approaches when representing similar emission sources. The City's HRA used a consistent and reasonable methodology to estimate potential health risks associated with project operations. Accordingly, the comment does not provide substantial evidence that the HRA results or conclusions are inaccurate or that additional mitigation is required. Therefore, no changes to the Draft EIR analysis or conclusions are warranted.

Comment A5-18

18. The VOC emission factor for Fueling/Hose Permeation is improperly listed as 0.008 lb/hr, as shown in Appendix B 1-HRA, Table 4. It should be 0.002 lb/hr based on emission factor of 0.03 lb/1000-gal from CARB (2022) Table 7.

Emission Factor Table for Underground Storage Tanks and assumed throughput of 1,000 gal/day and 17 hr/day. The District recommends updating the associated calculations for the modeling analysis.

Response A5-18

The comment states that the VOC emission factor used for the Fueling/Hose Permeation source in the City's HRA appears to be overstated and recommends revising the emission factor from 0.008 lb/hr to 0.002 lb/hr based on CARB guidance and the assumed fuel throughput. The comment recommends updating the associated calculations used in the modeling analysis. Because the recommended correction would reduce the VOC emission rate used in the HRA, incorporation of the revised emission factor would result in lower emissions and would not increase the health risk estimates presented in the Draft EIR. The HRA conclusions are based primarily on diesel particulate matter emissions and other toxic air contaminants associated with project operations, rather than VOC emissions from fueling hose permeation. Therefore, correction of the VOC emission factor would not materially affect the HRA results or the significance conclusions presented in the Draft EIR. Accordingly, no changes to the impact conclusions or mitigation measures are required.

Comment A5-19

19. Impact 3.3-5 (and Mitigation Measure 3.3-5) should discuss the primary Phase I Operations odor producing sources is the receipt, sorting and handling, and storage of municipal wastes at the material recovery facility; and primary Phase II Operations odor producing source is the composting.

    For the materials recycling facility, the odor reduction plan should discuss all procedures to minimize odors, including a time limit to process materials from receipt, time limit to send non-recyclable fines offsite, cleanup procedures at end of shifts, capture and treatment of facility ventilation exhaust gases, containers used for storage of segregated recyclables, and good housekeeping practices within the facility (including managing wase materials on floors and in baling areas, and conveyors, keep facility doors closed, and use of streetsweepers).

    For composting, Section 2.4.7 under "Sanitary Sewer" on page 2-23 states that contact water from composting operations would be evaporated on site and is not intended to be discharged to the sewer. On page 2-24 under "Stormwater Management" it states that a series (minimum two) of basins for contact water from the compost facility would be retained and reused in the composting process to the maximum extent possible. Accordingly, the District recommends that the odor reduction plan proposed by MM3.3-5 should exclusively address how the odor control would be proposed from these two specific operations as well as a limit on compost pile height, continuous monitoring and adjustment of compost temperature, moisture, Solvita maturity index, and specific oxygen uptake rate, procedures to prevent pile smoldering and smoking, time limit to integrate food wastes into compost piles, identification of good housekeeping procedures to control accumulated byproduct solids and liquids, and adequate aeration or leachate collection ponds.

Response A5-19

The comment recommends that Impact 3.3-5 and Mitigation Measure 3.3-5 more specifically address the primary odor-generating sources associated with Phase 1 and Phase 2 operations. The comment also recommends additional odor control measures and operational requirements for the material recovery facility and composting operations, including waste handling time limits, housekeeping practices, ventilation exhaust treatment, compost process monitoring, pile management, and management of contact water and leachate facilities.

As discussed in the Draft EIR, the primary odor-generating sources associated with the project include the receipt, handling, sorting, storage, and processing of municipal solid waste and organic materials. Mitigation Measure 3.3-5 was specifically developed to address odor emissions from these activities and requires preparation and implementation of a comprehensive Odor Reduction Plan applicable to all odor-generating operations at the facility.

Mitigation Measure 3.3-5 includes numerous elements identified by the comment, including requirements for receiving and processing organics within building enclosures, management of staging times, covered storage of putrescible materials and residuals, maintenance of aerobic conditions within composting operations, monitoring and management of moisture and pile conditions, identification of corrective actions for upset conditions, routine odor monitoring, complaint response procedures, adaptive management measures, and ongoing review and updating of

odor control practices. Mitigation Measure 3.3-5 also provides flexibility to incorporate additional engineering and operational controls as warranted based on facility design, operational experience, regulatory requirements, and observed odor conditions.

The City agrees that specific operational practices for waste handling, compost management, housekeeping, leachate/contact water management, and odor control will be important considerations during preparation of the Odor Reduction Plan. In response to this comment, Mitigation Measure 3.3-5 has been revised to more explicitly identify the primary Phase 1 and Phase 2 odor-generating sources, including material recovery facility operations, composting operations, and management of contact water and leachate-related facilities. The mitigation measure has also been revised to clarify that the Odor Reduction Plan shall identify housekeeping procedures for processing and storage areas and procedures to prevent and respond to smoldering, smoking, anaerobic conditions, and other upset conditions that could increase odor emissions. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes. These revisions further clarify the types of odor-generating activities and odor-control measures that shall be addressed in the Odor Reduction Plan while maintaining the performance-based and adaptive framework of Mitigation Measure 3.3-5; however, the analysis and conclusions of the Draft EIR remain unchanged.

Comment A5-20

20. The DEIR Section 2.4.4 states that an Aerated Static Pile (ASP) type of composting system will be used and is applied as the Best Available Control Technology (BACT) in emission calculation shown in Appendix C "Compositing Fugitive Emissions". The District recommends that the ASP system should be identified as a suitable mitigation measure in MM 3.3-5 to assist mitigation odor issues from the proposed composting facility.

Response A5-20

The comment states that the Draft EIR identifies an Aerated Static Pile (ASP) composting system and assumes use of ASP technology in the emissions analysis. The comment recommends that use of an ASP system be specifically identified in Mitigation Measure 3.3-5 as an odor control measure for the proposed composting facility.

As described on page 2-18 in Chapter 2, "Project Description," of the Draft EIR, the potential future compost facility would use an ASP system. In addition, Mitigation Measure 3.3-5 specifically identifies covered ASP composting operations as an odor-generating source that must be addressed through the Facility Odor Reduction Plan. The mitigation measure also requires implementation of operational controls applicable to ASP composting, including maintenance of aerobic conditions, monitoring and management of aeration, moisture, and pile conditions, and corrective actions to address upset conditions that could increase odor generation. Because Mitigation Measure 3.3-5 already expressly identifies covered ASP composting operations and requires development and implementation of odor control measures for those operations, the recommendation is already addressed by the Draft EIR. Therefore, no changes to the Draft EIR are required.

Comment A5-21

21. Table 3.3-5 presents that the proposed organic processing facility and biomass facility would emit criteria pollutant emissions more than 25 tons per year. Therefore, it is subject to both the local and federal permitting program requirements. In addition to District' Rule 502 New Source Review, Mitigation Measure 3.3-3b should also include additional discussion for District Rule 507 Federal Operating Permit Program. Please note that an operational permit can be issued to the proposed facility only when all regulatory requirements from both regulations are met, which includes but is not limited to obtaining and retiring enough emissions reduction credits to offset all stationary source NOx and VOC emissions, and use of Best Available Control Technology for NOx (which would likely require at least the performance of selective catalytic reduction or equivalent).

Thank you for allowing the District this opportunity to review and comment on the Project. Please do not hesitate to contact me at (530) 745.2325 or ychang@placer.ca.gov if you have any questions.

Response A5-21

The comment states that the potential future organics processing facility and potential biomass facility could emit criteria pollutants in amounts exceeding 25 tons per year and therefore may be subject to both local and federal

stationary source permitting requirements. The comment recommends that Mitigation Measure 3.3-3b be revised to address not only PCAPCD Rule 502 (New Source Review), but also Rule 507 (Federal Operating Permit Program), and notes that permit issuance may require compliance with applicable offset, emissions control, and BACT requirements.

The Draft EIR has been revised to include additional discussion of federal Title V operating permit requirements in the air quality impact analysis. As explained in the revised text, operation of the Potential Future Organics Processing Facility and/or Potential Future Biomass Gasification Facility could be subject to federal Title V permitting requirements, depending on final facility design and emissions. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes.

Mitigation Measure 3.3-3b addresses compliance with applicable air district permitting requirements and was intentionally drafted to encompass all applicable regulatory requirements that may apply at the time permits are sought. The City agrees that, if applicable, project facilities would be required to comply with PCAPCD Rule 507, Rule 502, and all other applicable federal, state, and local permitting requirements, including any requirements related to emissions offsets, emissions controls, BACT, monitoring, recordkeeping, reporting, and permit conditions. Such requirements would be evaluated and applied by PCAPCD during the permitting process based on the final facility design and emissions characteristics. Because compliance with all applicable permitting requirements is already required by law and would occur through PCAPCD's permitting process, no additional revisions to Mitigation Measure 3.3-3b are necessary.

Letter A6 City of Lincoln

Angela Frost, Environmental Services Manager, City of Lincoln Public Works Department
June 18, 2026

Comment A6-1

The City of Lincoln appreciates the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the proposed Roseville Environmental Utilities Operations Center (EUOC) Project (State Clearinghouse No. 2024060953).

Lincoln recognizes the need for long-range planning to accommodate future growth, evolving solid waste regulations, and changing waste management practices. We commend the City of Roseville for proactively planning for future operational needs. However, as a neighboring jurisdiction and member agency that relies upon the Western Placer Waste Management Authority (WPWMA) for disposal and recycling services, Lincoln requests additional analysis regarding several potential regional impacts associated with the proposed project.

Response A6-1

The comment states that the City of Lincoln is a neighboring jurisdiction and WPWMA member agency, and requests further analysis of potential regional impacts identified in the Draft EIR for the project. The comment provides a summary of detailed comments provided below. See responses to the detailed comments below.

Comment A6-2

1. Regional Waste Flow and WPWMA Impacts

The DEIR references existing agreements between the City of Roseville and the WPWMA and indicates that certain waste streams will continue to be delivered to WPWMA facilities through at least 2043. The City of Lincoln requests clarification regarding:

- The specific waste streams that will continue to be delivered to WPWMA facilities;
- The estimated annual tonnage of each material type;
- The projected reduction in material currently delivered to WPWMA resulting from implementation of the proposed EUOC and Resource Recovery and Transfer Operations (RRTO) facility; and
- The assumptions used to evaluate future waste flow allocations.

Lincoln is concerned that diversion of significant waste volumes from WPWMA may affect facility utilization, revenue generation, and long-term financial planning for the regional system.

Response A6-2

The comment requests additional detail regarding how the project would affect regional waste flows to WPWMA. Specifically, the comment requests clarification on the types and quantities of waste that will continue to be delivered, projected reductions in tonnage, and the assumptions used for future waste allocation.

The Draft EIR describes the anticipated materials handling in Section 2.2.4, "Projected Increases in Demand for Materials Hauling." The level of detail requested, including specific future tonnages by material type, operational assumptions, and allocation strategies, constitutes speculative, operational, and/or proprietary planning information that is not required for evaluation in an EIR. Under CEQA, an EIR is required to analyze the physical environmental effects of a project. The requested information relates primarily to economic considerations, including facility utilization rates, revenue generation, and financial planning for WPWMA. An evaluation of socioeconomic impacts is not required by CEQA because it is not an impact to the natural or physical environment. As stated in Section 15131 of the CEQA Guidelines, the economic and social effects of a project shall not be treated as significant effects on the environment. An EIR can trace a path between a social or economic effect to determine if there is a cause and effect between a social or economic effect and a change in the environment (such as blight). The Draft EIR does not identify, and the comment does not provide, information indicating that the potential socioeconomic effects identified in the comment would result in a significant impact on the physical environment.

The Draft EIR adequately evaluates the environmental effects of the project, including solid waste handling, transportation, air quality, greenhouse gas emissions, and other relevant resource areas based on reasonable assumptions and available information. Future detailed decisions regarding waste stream allocations, contractual arrangements, and operational logistics would be addressed through separate planning and interagency coordination processes, as appropriate, and are outside the scope of CEQA review. Therefore, no additional analysis is required in the EIR.

Comment A6-3

2. Regional Cost-Sharing and Financial Sustainability

WPWMA serves as a critical regional asset utilized by the Cities of Lincoln, Roseville, Rocklin, and Placer County. Recent investments in processing infrastructure and facility improvements were based upon projected waste flows and long-term regional growth assumptions.

The DEIR should evaluate whether diversion of material currently delivered to WPWMA could:

- Reduce facility utilization rates;
- Increase fixed costs borne by remaining member agencies;
- Increase tipping fees or disposal costs;
- Affect future capital planning and infrastructure investments; or
- Impact the long-term financial sustainability of the regional waste management system.

Lincoln respectfully requests that the DEIR analyze the potential impacts of the proposed project on regional solid waste infrastructure and regional cost-sharing arrangements resulting from diversion of waste streams currently processed through WPWMA facilities.

Response A6-3

The comment requests that the Draft EIR evaluate how diversion of waste from WPWMA facilities could affect regional cost-sharing and financial sustainability. Specifically, the comment expresses concern about potential reductions in facility utilization, increased costs to remaining member agencies, higher tipping fees, impacts on capital planning, and broader effects on the long-term financial sustainability of the regional waste management system.

As described in response to comment A6-2, CEQA does not require analysis of economic or social impacts because they are not physical environmental effects; no evidence has been provided in the comment demonstrating that such impacts would lead to a significant physical environmental change. The issues raised in the comment, such as facility utilization rates, tipping fees, and financial planning, are economic and administrative in nature. The comment does not identify a physical environmental impact that would result from these potential fiscal changes beyond those already evaluated in the Draft EIR. As such, these topics are outside the scope of CEQA review.

The Draft EIR appropriately evaluates the project's potential impacts related to solid waste handling, transportation, air quality, greenhouse gas emissions, and other relevant resource areas based on reasonable assumptions and available information. Potential adjustments to regional cost-sharing arrangements, funding mechanisms, or infrastructure investment strategies are matters for separate decision-making processes, not environmental analysis under CEQA. Therefore, no additional analysis of economic impacts to WPWMA or its member agencies is required in the EIR.

Comment A6-4

3. Resource Recovery and Transfer Operations (RRTO) Analysis

The proposed RRTO facility appears to be a central component of the project. The City of Lincoln requests additional information regarding:

- Projected annual tonnage of municipal solid waste, recyclables, and organics processed through the facility;
- Daily and peak-period truck trip generation;
- Long-term expansion assumptions and buildout capacity;
- Whether future operations could expand beyond those currently analyzed in the DEIR; and
- Whether the environmental analysis is based on realistic maximum operational capacity.

Lincoln requests confirmation that the DEIR evaluates the reasonably foreseeable maximum operational scenario for the facility rather than only near-term operational conditions.

Response A6-4

The comment requests additional details regarding the proposed RRTO facility, including projected waste tonnage, truck trip generation, long-term capacity and expansion assumptions, and whether the Draft EIR evaluates a realistic maximum operational scenario rather than near-term conditions only.

The Draft EIR includes an analysis of the proposed RRTO facility based on a conservative, reasonably foreseeable maximum operational scenario, consistent with CEQA requirements. As described in Section 2.2.4, "Projected Increases in Demand for Materials Handling," (pages 2-5 through 2-6), the City developed both near-term and long-term demand scenarios based on projected population growth, regional growth, and the potential to serve waste haulers outside the City. Chapter 2, "Project Description," identifies an estimated annual material throughput demand of approximately 270,000 tons per year under near-term conditions and approximately 660,000 tons per year under long-term conditions through 2058 (see Table 2-1 on page 2-6). Chapter 2, "Project Description," further states on page 2-6 that the 660,000-ton-per-year estimate was developed using a 2.5 percent annual growth rate through 2058 and was intended to represent a conservative upper-bound estimate of future demand. Accordingly, the Draft EIR evaluates the project's potential impacts based on projected long-term operational conditions and ultimate facility buildout, rather than solely near-term operations.

As further described in Section 2.2.4, "Projected Increases in Demand for Materials Handling," the long-term demand scenario represents the maximum total solid waste stream anticipated to be managed by the facility, including municipal solid waste, recyclable materials, and organic waste generated within Roseville and potentially delivered from sources outside the City. The Draft EIR (page 2-6) identifies this scenario as a conservative estimate intended to evaluate the reasonably foreseeable upper bound of facility demand through 2058.

Chapter 2, "Project Description," also provides information regarding existing waste streams currently generated within Roseville, including approximately 84,000 tons per year of municipal solid waste, 33,000 tons per year of

recyclables, and 33,000 tons per year of organic waste (Section 2.2.1, pages 2-4 through 2-5). While the Draft EIR identifies existing waste stream quantities by material type, long-term throughput projections are presented on a combined facility-capacity basis because the RRTO Facility is intended to accommodate varying quantities of municipal solid waste, recyclables, and organic materials over time based on service demand, regulatory requirements, and market conditions.

Long-term expansion assumptions are described in Section 2.4, "Description of the Proposed Project" (page 2-7). The project is proposed in two phases, with Phase 2 including expansion of the RRTO Facility and providing capacity through 2058. Table 2-2 identifies the RRTO Facility expansion from approximately 200,000 square feet in Phase 1 to an additional 122,000 square feet at buildout for a total of 322,000 square feet. The Draft EIR also explains that the facility is intended to accommodate materials generated both within and outside the City and includes objectives related to serving regional waste streams (see page 2-6).

Information regarding daily and peak-period truck trip generation is provided in Section 3.16, "Transportation and Circulation," which evaluates vehicle and truck traffic associated with operation of the RRTO Facility and other project components under the project's long-term operational assumptions (see in particular Table 3.16-2 on page 3.16-20). The Draft EIR transportation analysis was conducted using the project characteristics and buildout assumptions described in Chapter 2 and, therefore, reflects anticipated truck activity associated with the reasonably foreseeable operational scenario evaluated in the Draft EIR.

The Draft EIR appropriately evaluates the project's environmental impacts related to solid waste handling, transportation, air quality, GHG emissions, and other relevant resource areas based on the project description, including the long-term throughput projections, buildout assumptions, and facility capacity planned through 2058. Any future modifications or expansions beyond the scope of what is analyzed in the Draft EIR would be subject to separate environmental review, as required by CEQA. Therefore, the analysis presented in the Draft EIR is sufficient, and no additional information or analysis is required.

Comment A6-5

4. Compatibility with Regional Waste Infrastructure

The City of Lincoln requests additional analysis regarding the project's compatibility with existing regional waste management infrastructure, including:

- Potential effects on existing regional facilities;
- Future material recovery operations that may be contemplated but not fully defined;
- Changes to regional waste flow patterns; and
- Cumulative impacts to regional solid waste management capacity.

The City believes that a comprehensive evaluation of these issues is important to ensure regional coordination and long-term planning consistency among affected agencies.

Response A6-5

The comment requests additional analysis of the project's compatibility with regional waste management infrastructure, including potential effects on existing facilities, future material recovery operations, changes in regional waste flow patterns, and cumulative impacts to regional solid waste capacity.

The Draft EIR adequately evaluates the project's impacts on solid waste capacity and cumulative conditions in accordance with CEQA requirements. The analysis considers whether sufficient landfill and waste processing capacity exists to accommodate the project and concludes that impacts would be less than significant (see Impact 3.15-3 on pages 3.15-16 through 3.15-18). The Draft EIR also addresses cumulative impacts related to solid waste by evaluating the project in the context of other past, present, and reasonably foreseeable future projects (see Section 4.3.15, "Public Utilities," particularly the discussion of solid waste on page 4-22). The analysis explains that the cumulative setting includes the WPWMA service area and recognizes future regional growth in waste generation, while also

identifying the approved expansion of the Western Regional Sanitary Landfill and concluding that sufficient regional capacity exists through the planning horizon.

In addition, the Draft EIR evaluates transportation and GHG impacts associated with project-related waste collection, transfer, and processing activities, which inherently consider changes in transportation of waste throughout the region. Impact 3.16-2 evaluates project-generated truck and employee trips associated with waste transfer and recovery operations and analyzes associated changes in regional travel patterns. Likewise, Section 3.4, "Greenhouse Gas Emissions," quantifies operational emissions from mobile truck trips, material transfer activities, material recovery operations, and potential future organics processing activities (see Tables 3.4-4 and 3.4-6). These analyses account for the physical environmental effects associated with changes in the movement of solid waste and recovered materials.

Speculation regarding future, undefined material recovery operations or shifts in regional waste management strategies is not required where such details are not reasonably foreseeable or would not alter the environmental impact conclusions. Accordingly, the Draft EIR evaluates a reasonably foreseeable future organics processing facility as part of Phase 2 and assesses its potential transportation, air quality, GHG, utility, and cumulative environmental effects.

The additional topics raised in the comment, such as redistribution of waste flows among regional facilities, potential effects on the use or operation of existing infrastructure, and coordination of future material recovery efforts, primarily concern regional planning, operational, and economic considerations, rather than physical environmental impacts. As discussed in responses to comments A6-2 through A6-4, CEQA does not require evaluation of economic or administrative effects (State CEQA Guidelines Section 15131) unless they would result in a reasonably foreseeable physical environmental change, which has not been demonstrated. To the extent that changes in waste flow patterns could result in physical environmental effects, those effects are addressed through the Draft EIR's transportation, GHG emissions, utilities, and cumulative impact analyses.

Issues of regional coordination, infrastructure utilization, and long-term planning consistency are appropriately addressed through interagency agreements, policy planning, and ongoing coordination among WPWMA member agencies, rather than through CEQA environmental analysis. Therefore, the Draft EIR provides sufficient evaluation of the project's potential impacts related to regional solid waste infrastructure, and no additional analysis is required.

Comment A6-6
Conclusion

The City of Lincoln appreciates the opportunity to comment on the Draft EIR and respectfully requests that the City of Roseville provide additional analysis and clarification regarding the issues identified above. In particular, Lincoln seeks a better understanding of how the proposed EUOC and RRTO facility may affect regional waste flows, WPWMA operations, cost allocation among member agencies, and the long-term sustainability of the regional waste management system.

The City of Lincoln respectfully requests that these comments be incorporated into the Final EIR and that responses be provided pursuant to CEQA requirements.

We look forward to continued coordination throughout the environmental review process.

Response A6-6
The comment provides a summary of detailed comments provided above. See responses to the detailed comments above.

Letter A7 Western Placer Waste Management Authority

Scott Scholz, General Manager
June 22, 2026

Comment A7-1
The Western Placer Waste Management Authority (WPWMA) appreciates the opportunity to review and provide comments on the Draft Environmental Impact Report (DEIR) for the Roseville Environmental Utilities Operations Center Project (Project).

The WPWMA is a regional agency established in 1978 by the County of Placer and the cities of Roseville, Rocklin and Lincoln (Member Agencies) governed by a Board of Directors comprised of elected officials from each of the Member Agencies. The WPWMA provides recycling and waste disposal services to those communities as well as the cities of Auburn and Colfax and the Town of Loomis. The WPWMA also provides these services to individuals, business entities and other governmental agencies in and around Placer County. In total, the WPWMA provides waste management and recycling services to a population of approximately 400,000 and currently receives and manages approximately 484,000 tons per year of residentially and commercially generated solid waste and recyclables.

The WPWMA's nearly 1,000-acre campus, located at the intersection of Athens Avenue and Fiddyment Road immediately north of the City of Roseville and approximately 5.5 miles northeast of the Project location provides a conveniently located, comprehensive solid waste management system that includes a materials recovery facility (MRF), construction and demolition debris recovery facility, organics composting facility, residential and commercial recycling drop-off and buy-back center, permanent household hazardous waste collection facility, and the only remaining active sanitary landfill in Placer County. The WPWMA's systems were designed and are operated to ensure that Placer County's municipalities, businesses and residents are able to comply with state and federal solid waste management laws and regulations, including the organic waste diversion mandates of SB 1383 and required covered products of SB 54, in a cost effective and sustainable manner.

In an effort to proactively plan for continued regional growth, changes in solid waste and climate-related regulations, and ever-increasing volatility in foreign and domestic recyclable commodity markets, the WPWMA prepared and its Board of Directors unanimously certified the Renewable Placer Waste Action Plan Environmental Impact Report (EIR) in December 2022. The EIR represented the culmination of 6 years of extensive planning and research by the WPWMA and its Member Agencies, including the City of Roseville, to identify the most sustainable, cost-effective approach focused on developing a local circular economy and ensuring long-term, locally controlled solid waste management capacity and continued regulatory compliance to support the Member Agencies' solid waste and recycling needs for at least the next 100 years.

The initial phase of Waste Action Plan included the $120 million renovation of the WPWMA's MRF and composting facilities to comply with SB 1383 organic materials diversion requirements and manage waste streams regardless of collection method; the upgraded MRF is also capable of processing both mixed (black bin) and source-separated (blue bin) materials for recovery of recyclable materials. After completing construction of its enhanced composting facility, the WPWMA achieved an organics recovery rate of over 82% as part of its Q1 2026 SB 1383 organics measurement requirements.

The WPWMA has also reserved space on its campus to foster development of a local circular economy by facilitating compatible technologies and manufacturing to utilize materials recovered at the WPWMA's MRF. This pivotal action is intended to create and support a vibrant and sustainable local recyclables market, reduce the environmental impacts associated with long-distance transport of materials to foreign and domestic markets, and create local jobs, helping to enhance the region's economy.

Response A7-1

The comment is an introductory statement and does not address the content, analysis, or conclusions in the Draft EIR. Therefore, a response is not provided here. Responses to specific comments concerning environmental issues are provided below.

Comment A7-2

Based on information provided in the City's June 21, 2024 Notice of Preparation for the Project, the WPWMA requested that the City conduct a comprehensive evaluation of all potentially consequential environmental and economic impacts of the proposed Project on the existing regional solid waste management system analyzing at least the following resource areas associated with additional vehicle traffic necessary to transport materials to the Project site, recovered materials bound for various end markets, and residual wastes requiring disposal at a sanitary landfill: 1) Greenhouse Gas Emissions, 2) Transportation/Traffic, 3) Hazards & Hazardous Materials, and 4) Air Quality.

Based on its review of the DEIR, the WPWMA was unable to discern if the requested analysis was performed. Given that the Project contains many of the same elements as the WPWMA's existing operation which have been designed and are operated to achieve compliance with SB 1383 and other solid waste regulations, and that the City is planning for waste flows that are approximately 40% greater than the current annual tonnages received and processed at the WPWMA's facility, the WPWMA believes a clear and transparent summary of the requested analysis is critical for the Decision makers and the public to understand the potential long-term impacts of the Project.

The WPWMA looks forward to continuing to engage with the City of Roseville as it evaluates its proposed Project to ensure the long-term viability of the WPWMA's facilities and operations in order to continue providing valuable public services to the WPWMA's customers, including the City of Roseville.

Response A7-2

The comment states that WPWMA previously requested, in an NOP comment letter, a comprehensive analysis of potential environmental and economic impacts of the project on the regional solid waste system, including greenhouse gas emissions, transportation/traffic, hazards, and air quality, but could not determine from the Draft EIR whether this analysis was conducted. The comment also emphasizes the importance of a clear and transparent summary of these impacts, particularly given similarities to WPWMA operations and anticipated increased waste flows.

The Draft EIR evaluates the project's potential impacts in accordance with CEQA, including analysis of GHG emissions, transportation, hazards and hazardous materials, and air quality; however, CEQA does not require evaluation of economic or fiscal impacts. While the analysis is presented within the applicable resource sections (see Sections 3.4, "Greenhouse Gas Emissions," 3.16, "Transportation and Circulation," 3.10, "Hazards and Hazardous Materials," and 3.3, "Air Quality") rather than as a single consolidated summary focused on regional solid waste system effects, the Draft EIR provides sufficient information and analysis, by category of impact, for decision makers and the public to understand the project's potential impacts.

Letter A8 Placer Conservation Authority

Greg McKenzie, Executive Director
June 20, 2026

Comment A8-1

I. Introduction and Interest of the Placer Conservation Authority

The Placer Conservation Authority (the "Authority" or "PCA") submits these comments on the City of Roseville's Draft Environmental Impact Report ("Draft EIR" or "DEIR") for the proposed Roseville Environmental Utilities Operations Center Project (the "Project"). The Authority is a California joint exercise of powers authority - formed by the County of Placer, the City of Lincoln, the Placer County Water Agency, and the South Placer Regional Transportation Authority - tasked with implementing the Placer County Conservation Program ("PCCP"), including the Western Placer County Habitat Conservation Plan and Natural Community Conservation Plan (the "HCP/NCCP") and the assembly, management, and perpetual stewardship of a regional reserve system for sensitive native plants, wildlife, and natural communities.

The Authority has a direct and substantial interest in this Project because of where it would be built. The Project site lies immediately east of the Clemetson Property - which therefore adjoins the Project's western boundary - and immediately south of the Mourier West Property, which adjoins the Project's northern boundary across Pleasant Grove Creek. (See attached map.) Both are PCCP reserve-system properties; they are not ordinary parcels of farmland. Together with the Reason Farms Environmental Preserve, the Al Johnson Wildlife Area, the Authority's 241-acre Mourier East preserve, the Toad Hill Ranch Mitigation Bank, and other conservation areas, they form a landscape-scale block of conservation lands totaling approximately 4,116 acres, assembled to link the Pleasant Grove Creek corridor with existing and planned conservation lands and to preserve nesting and foraging habitat for Swainson's hawk, tricolored blackbird, burrowing owl, and other listed species. Protected vernal pool species, including vernal pool fairy shrimp, occur in multiple aquatic features on the Mourier West Property directly north of the Project site and Clemetson Property directly west of the Project site.

Response A8-1

The comment explains PCA's role in implementing the PCCP and managing regional conservation lands. The comment notes that the project site is immediately adjacent to PCCP reserve properties, including the Clemetson and Mourier West reserves, and emphasizes the ecological importance of these lands for special-status species and protected habitats, including Swainson's hawk, tricolored blackbird, burrowing owl, and vernal pool species. The comment is an introductory statement and does not address the content, analysis, or conclusions in the Draft EIR. Therefore, a response is not provided here. Responses to specific comments concerning environmental issues are provided below.

Comment A8-2

Placing a large-scale, industrial-character municipal operations center immediately adjacent to these reserve lands will, absent appropriate design features and minimization measures, cause both direct and indirect impacts to their habitat values and will complicate the Authority's management of them. The Authority raised these concerns in its July 19, 2024 letter responding to the City's June 21, 2024 Notice of Preparation, in which it asked the EIR to (1) assess the direct and indirect effects of converting natural and semi-natural lands to urban use on the Project site and on the surrounding conservation lands, including the overall viability of the associated conservation plans and the listed and unlisted species they protect; (2) analyze indirect effects including groundwater and surface-water quality, lighting, noise, trash, impacts to nesting birds, and foraging habitat for listed bird species; and (3) analyze whether the Project is consistent with the HCP/NCCP and the County Aquatic Resources Program. Regrettably, the Draft EIR does not meaningfully respond to these requests.

CEQA requires an EIR to serve as a good-faith, full-disclosure informational document that identifies and clearly describes both the direct and the reasonably foreseeable indirect significant environmental effects of a project, including "alterations to ecological systems" and effects the project "might cause or risk exacerbating by bringing development and people into the area affected." (Pub. Resources Code, §§ 21002.1, 21100, subd. (b); CEQA Guidelines, §§ 15121, 15126.2, subd. (a}, 15358, subd. (a)(2), 15064, subd. (d).) Indirect effects on biological resources - changes to hydrology, noise, light, human intrusion, and the introduction or spread of invasive species - are exactly the kind of reasonably foreseeable secondary effects CEQA requires the EIR to analyze. As to the adjacent reserve lands, the Draft EIR has not done so, and the analysis should be revised.

Response A8-2

The comment states that the project's location adjacent to PCCP reserve lands could result in direct and indirect impacts to conservation resources, including effects related to hydrology, water quality, lighting, noise, trash, human activity, invasive species, nesting birds, and foraging habitat. The comment further states that the Draft EIR does not adequately analyze these potential effects or evaluate consistency with the HCP/NCCP and recommends that the analysis be revised.

As discussed in responses to similar comments above regarding the PCCP and adjacent reserve lands (see responses to comments A3-5 through A3-7 and responses in this comment letter), the project site is not located within the PCCP plan area and is not subject to PCCP's permit requirements, conservation strategy, or mitigation framework. Nevertheless, the Draft EIR evaluates the project's potential direct and indirect impacts on biological resources, including special-status species, nesting birds, habitat resources, wildlife movement (see Section 3.5 in the Draft EIR); hydrology and water quality (see Section 3.11 in the Draft EIR); noise (see Section 3.12 in the Draft EIR); and other environmental topics that could affect adjacent lands.

The Draft EIR analysis considers the existing environmental setting, including adjacent open space, waterways, habitat areas, and conservation lands. The Draft EIR evaluates the project's potential impacts based on CEQA's significance criteria and includes applicable avoidance, minimization, and mitigation measures to reduce impacts where necessary.

As described in responses to comment A3-5, the City identified the project site as early as 2003 for City use. As described in Chapter 2, "Project Description," of the Draft EIR, the City purchased the project site (and the larger Reason Farms area) in 2003. Since the purchase, the project site has been intended for future City use. The existing General Plan land use designation for the project site is P/QP, which primarily allows for municipal and governmental

facilities. The zoning for the project site is PD. As a public facility, the project would be consistent with the P/QP land use designation and PD zoning district.

The City acknowledges that portions of the lands adjacent to the project site are now included within the PCCP reserve system and provide habitat values that contribute to the PCCP conservation network (see Figure 2-1 in this Final EIR, above).

Field observations conducted during the April 2024 biological survey of the project site indicated that portions of the western adjacent property were being actively grazed and exhibited characteristics consistent with grazed grassland conditions at the time of the survey. Regardless of the land use designation or conservation status of adjacent properties, the Draft EIR biological resources analysis evaluated the potential for project-related direct and indirect effects on adjacent habitats, special-status species (including PCCP Covered Species), sensitive natural communities, and wildlife movement corridors. Accordingly, the impact analysis was not dependent upon whether adjacent lands were characterized as agricultural land, open space, or PCCP reserve lands.

The Draft EIR provides an analysis of potential impacts to biological resources that may occur on or adjacent to the project site. The Draft EIR does not identify substantial evidence that the project would impede implementation of the PCCP, interfere with reserve management objectives, or preclude achievement of the PCCP's biological goals and objectives. Therefore, the Draft EIR's biological resources analysis and conclusions remain unchanged.

Comment A8-3

II. The Draft EIR Does Not Adequately Address Impacts to the Adjacent Reserve Properties, Including Clemetson and Mourier West

The Draft EIR's biological resources analysis acknowledges that Project operation may cause indirect effects including "reduction in water quality caused by storm water runoff, erosion, and siltation; increased litter; noise and light pollution; alteration of the hydrologic regime…; intrusion of humans; and introduction or spread of invasive species that could result in habitat degradation." (DEIR, § 3.5, p. 3.5-23.) These are the very urbanization effects the Authority identified. The deficiency is not that the Draft EIR fails to name these effects - it is that the Draft EIR evaluates them **almost entirely with respect to Pleasant Grove Creek and the riparian corridor to the north**, and does not evaluate them with respect to the reserve lands the Project actually abuts. Specifically:

- **Clemetson is not mentioned at all.** The Draft EIR does not identify, describe, or analyze the Clemetson Property - the reserve parcel immediately west of the Project - anywhere in its biological, land use, aesthetics, or noise analyses. An EIR cannot disclose impacts to a resource it never acknowledges. (CEQA Guidelines,§ 15125, subds. (a), (c).)
- **Mourier West is acknowledged only in passing.** The Draft EIR refers to Mourier West once, as "[t]he nearest PCCP Reserve Acquisition Area … approximately 930 feet north of the proposed development area," and then uses that reference to dismiss further analysis. (DEIR, § 3.5., p. 3.5-22.) A separation of roughly 930 feet is well within the distance at which urban-edge effects on habitat occur; it is a reason to analyze impacts, not to forgo the analysis. The Draft EIR does not assess the Project's indirect effects on the vernal pool features and special-status species documented on Mourier West, or on its value as Swainson's hawk and other listed-bird foraging and nesting habitat.

Response A8-3

The comment states that the Draft EIR does not adequately analyze potential indirect impacts on adjacent PCCP reserve properties, particularly the Clemetson and Mourier West reserves. The comment states that while the Draft EIR identifies potential urban-edge effects such as noise, lighting, litter, invasive species, human intrusion, and hydrologic changes, it does not specifically evaluate these effects on the adjacent reserve lands and associated special-status species and habitats.

As discussed in the responses to previous comments regarding the PCCP and adjacent reserve lands (see responses to comments A3-5 through A3-7 and responses in this comment letter), the Draft EIR evaluates the project's potential direct and indirect impacts on biological resources, including special-status species, nesting birds, habitat resources,

wildlife movement, water quality, hydrology, noise, lighting, and other environmental factors that could affect adjacent lands and habitat areas. The purpose of the biological resources analysis is to evaluate the project's potential physical impacts on environmental resources, rather than to separately analyze individual neighboring properties. The analyses and significance determinations are based on the presence of biological resources and habitats in the project vicinity, including those associated with Pleasant Grove Creek and adjacent open space and conservation lands. Mitigation measures are incorporated to avoid, minimize, or reduce impacts (see Mitigation Measures 3.5-1, 3.5-2a through 3.5-2k, 3.5-3, 3.5-4a and 3.5-4b, 3.5-5, and 3.5-6). In response to comments received on the Draft EIR, the analysis of Impact 3.5-4 and Mitigation Measure 3.5-4b have been revised to further evaluate and address the potential for indirect impacts on off-site wetlands resulting from project implementation. In addition, Mitigation Measure 3.5-5 has been expanded to also apply to the nearby reserve properties to minimize lighting impacts. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes.

The City recognizes that the Clemetson and Mourier West properties are adjacent to the project site, are included within the PCCP reserve system, and provide habitat values that contribute to the PCCP conservation network.

As described in response to comment A8-2, field observations conducted during the April 2024 biological survey of the project site indicated that portions of the western adjacent property were being actively grazed and exhibited characteristics consistent with grazed grassland conditions at the time of the survey. During the April 2024 survey, off-site areas were viewed through binoculars by a qualified biologist. Although the biologist observed low areas north of the project site, the areas were dry and lacked vegetation, and no potential regulated wetlands were observed. However, information subsequently provided by PCA in July 2026 indicates that wetlands do likely occur on adjacent lands that are now designated as PCCP reserve properties (Figure 2-2 in this Final EIR shows the potential wetlands on the Clemetson property, to the west of the project site, as provided by PCA). Regardless of the land use designation or conservation status of adjacent properties, the Draft EIR biological resources analysis evaluated the potential for project-related direct and indirect effects on adjacent habitats, special-status species (including PCCP Covered Species), sensitive natural communities, and wildlife movement corridors. Accordingly, the impact analysis was not dependent upon whether adjacent lands were characterized as agricultural land, open space, or existing or future PCCP reserve lands.

The City also notes that the Clemetson and Mourier West properties were acquired by PCA in 2025, after circulation of the NOP for the project and after preparation of the EIR analyses was already underway, although the Draft EIR was not published until May 2026. Consistent with CEQA, the Draft EIR evaluates the environmental setting and potential impacts based on conditions existing during the environmental review process and focuses on the biological resources present in and adjacent to the project area rather than the ownership status of particular properties. The subsequent acquisition of these properties by PCA does not alter the underlying biological resources evaluated in the Draft EIR, does not change the project's regulatory obligations, and does not affect the significance determinations presented in the environmental analysis. Accordingly, the Draft EIR adequately evaluates the project's potential impacts to adjacent biological resources consistent with CEQA. As discussed above, revisions have been made to the analysis of Impact 3.5-4 and Mitigation Measure 3.5-4b to further address potential indirect effects on off-site wetlands, and Mitigation Measure 3.5-5 to further address potential edge effects on adjacent reserve properties; however, these revisions do not alter the significance determinations or conclusions presented in the Draft EIR.

Comment A8-4

- **Adjacent reserve land is mischaracterized as ordinary "agricultural land."** The environmental setting describes the Project as "surrounded by agricultural land uses to the west, south, and east." (DEIR, § 3.5.2, p. 3.5-6.) Treating the western neighbor (Clemetson) as undifferentiated farmland obscures that it is protected reserve land managed for conservation values, and it causes the Draft EIR to bypass any assessment of effects on those values.

Response A8-4

The comment states that the Draft EIR incorrectly characterizes land adjacent to the project site as agricultural land, noting that the Clemetson property to the west is now protected conservation land managed by PCA and should be evaluated accordingly.

As discussed in responses to previous comments regarding the PCCP and adjacent reserve lands (see responses to comments A3-5 through A3-7 and responses in this comment letter), the Draft EIR evaluates the project's potential direct and indirect impacts on biological resources based on the environmental resources present in and adjacent to the project area, and those analyses are not dependent on the ownership, management, or conservation status of adjacent properties.

The City also notes that the Clemetson property was acquired by PCA in 2025, after circulation of the NOP for the project and after preparation of the EIR analyses was underway. While the Draft EIR refers to surrounding agricultural land uses in describing the environmental setting, the subsequent acquisition of the property by PCA does not change the biological resources present on the site or alter the impact analysis and conclusions presented in the Draft EIR. For the reasons discussed in the responses above, the Draft EIR adequately evaluates potential impacts to adjacent biological resources and conservation values. Accordingly, no changes to the Draft EIR are required.

Comment A8-5

- **The edge-effect, lighting, noise, and wildlife-movement analyses are oriented to the creek, not to the reserve interfaces.** The Draft EIR's indirect-effects discussion, its fencing and setback measures, and Mitigation Measure 3.5-5 are framed around "trespassing into Pleasant Grove Creek," light "spillover onto sensitive riparian habitat," and a "structural barrier … directed perpendicular to Pleasant Grove Creek." (DEIR, § 3.5, p. 3.5-42.) None of these measures is designed to protect the reserve lands to the north (Mourier West) and west (Clemetson), and the Draft EIR offers no substantial evidence that creek-oriented measures would also protect those lands.

Response A8-5

The comment states that the Draft EIR's analysis of edge effects, lighting, noise, fencing, and wildlife movement focuses on Pleasant Grove Creek and riparian habitat rather than the adjacent Clemetson and Mourier West reserve properties.

As discussed in the responses to the preceding comments regarding the PCCP and adjacent reserve lands (see responses to comments A3-5 through A3-7 and responses in this comment letter), the Draft EIR evaluates the project's potential direct and indirect impacts on biological resources, including lighting, noise, human disturbance, habitat effects, and wildlife movement. The analysis and mitigation measures are intended to address these impact mechanisms regardless of property ownership and are based on the biological resources present in the project vicinity.

Mitigation Measure 3.5-5 references Mitigation Measures 3.12-1 and 3.12-3, which would reduce noise impacts on nearby sensitive human receptors. In addition, Mitigation Measures 3.12-1 and 3.12-3 would also reduce the potential for construction- and operation-related noise to affect nearby reserve properties that may support sensitive habitats and special-status wildlife species. Temporary noise barriers, acoustically treated building components, equipment shielding, quieter equipment, operational restrictions, and other noise attenuation measures would reduce the intensity and duration of noise reaching nearby reserve properties. By reducing noise levels at the project boundary and limiting nighttime noise-generating activities, these measures would help minimize disturbance, disruption of wildlife behavior, and potential avoidance of habitats by sensitive species in nearby reserve properties.

In response to this comment and other PCA comments, Mitigation Measure 3.5-5 has been expanded to also apply to the nearby Placer Conservation Authority reserve properties. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes. Mitigation Measure 3.5-5, as revised, would reduce potential impacts on nearby Placer Conservation Authority reserve properties that may support sensitive habitats and special-status wildlife species. Bird-friendly building design features, wildlife-conscious lighting design, and screening of construction lighting and vehicle headlights would reduce artificial light intrusion, minimize the potential for bird collisions, and lessen disruption of wildlife movement and behavior. By limiting light spillover into Pleasant Grove Creek and adjacent reserve properties through shielding, directional lighting, and other lighting controls, Mitigation Measure 3.5-5 would help maintain more natural nighttime conditions and reduce disturbance to sensitive species within the reserve properties.

See also responses to comments A3-7 and A8-12 through A8-16 regarding the City's commitment to incorporate applicable PCCP Development Interface Design Requirements and continue coordination with PCA regarding development interface measures intended to minimize potential impacts on adjacent reserve properties.

Comment A8-6

- **On-site species analysis is not a substitute for reserve-directed indirect-effects analysis.** The Authority recognizes that the Draft EIR analyzes special-status species on the Project site and the off-site utility easement - including a measure to mitigate the direct loss of on-site Swainson's hawk foraging habitat (Mitigation Measure 3.5-2h) and on-site vernal pool branchiopod habitat. But the Draft EIR does not analyze the Project's reasonably foreseeable indirect effects on the habitat values of the adjacent reserve lands, which is the omission at issue here.

Response A8-6

The comment states that, while the Draft EIR analyzes direct impacts to special-status species and habitats on the project site, it does not adequately evaluate the project's reasonably foreseeable indirect effects on the habitat values of adjacent PCCP reserve lands.

As discussed in the responses to the preceding comments regarding the PCCP and adjacent reserve lands (see responses to comments A3-5 through A3-7 and responses in this comment letter), the Draft EIR evaluates both direct and indirect impacts on biological resources, and is not limited to resources located on the project site.

The comment does not provide justification to develop a separate reserve-specific indirect effects analysis. The Draft EIR evaluates the relevant indirect impact mechanisms and their potential effects on biological resources in the project vicinity, including resources located on adjacent lands (see Figure 2-1 in this Final EIR, which identifies the locations of the reserve properties in relation to the project site, and Figure 2-2 in this Final EIR, which shows the potential wetlands on the Clemetson property, to the west of the project site, as provided by PCA). The comment does not provide substantial evidence demonstrating that the project would result in significant indirect impacts to adjacent reserve lands beyond those evaluated in the Draft EIR or that additional analysis would alter the significance determinations. Accordingly, for the reasons discussed in the responses above, no changes to the Draft EIR are required.

Comment A8-7

Response to the "not discussed further" determination. Under the heading "Issues Not Discussed Further," the Draft EIR states that, because "[t]he City of Roseville is not a participant in this PCCP and the project site is not within the PCCP plan area," the issue of conflict with an adopted HCP/NCCP is "not discussed further." (DEIR, § 3.5.3, p. 3.5-22.) This directly declines the Authority's NOP request that the EIR analyze the Project's consistency with the HCP/NCCP and CARP, and the Authority respectfully disagrees that it disposes of the matter. Whether or not the Project is subject to the HCP/NCCP, and whether or not the City is a permittee, CEQA independently requires the EIR to analyze the Project's reasonably foreseeable physical effects on the sensitive biological resources of the adjacent reserve. (CEQA Guidelines, §§ 15126.2, subd. (a), 15358, subd. (a)(2); Appendix G, § IV [substantial adverse effect on special-status species "directly or through habitat modifications" and on sensitive natural communities; interference with wildlife movement and nursery sites].) A determination that a possible significant effect need not be analyzed must rest on a brief statement of reasons supported by substantial evidence. (Pub. Resources Code,§ 21100, subd. (c); CEQA Guidelines,§§ 15128, 15384.) The stated reason - that the City is not a plan participant - addresses the City's permitting obligations, not the Project's physical effects on the reserve, and therefore does not satisfy CEQA.

Response A8-7

The comment disagrees with the Draft EIR's conclusion that consistency with the PCCP, HCP/NCCP, and County Aquatic Resources Program need not be discussed further because the project site is not within the PCCP plan area and the City is not a PCCP participant. The comment states that CEQA independently requires analysis of the project's reasonably foreseeable physical effects on adjacent reserve lands and their biological resources.

The statement on page 3.5-22 of the Draft EIR that consistency with the PCCP and HCP/NCCP is not discussed further reflects that the project is not located within the PCCP plan area, the City is not a PCCP permittee, and the project is not subject to PCCP permitting requirements or consistency determinations. As discussed in the responses to comments regarding the PCCP and adjacent reserve lands (see responses to comments A3-5 through A3-7 and responses in this comment letter), however, the Draft EIR does not rely on that fact to avoid analyzing biological impacts. Rather, the Draft EIR evaluates the project's potential direct and indirect impacts on biological resources

pursuant to CEQA, including special-status species, sensitive habitats, wildlife movement, lighting, noise, human disturbance, hydrology, and other relevant impact mechanisms. The analysis considers biological resources in the project vicinity, including those associated with adjacent lands, regardless of ownership or conservation status. The City therefore does not concur with the comment that the Draft EIR fails to evaluate reasonably foreseeable indirect effects on adjacent biological resources. For the reasons discussed in the responses to the preceding PCCP-related comments, the Draft EIR contains an adequate analysis of the project's potential physical impacts on biological resources consistent with CEQA. Accordingly, no changes to the Draft EIR are required.

Comment A8-8

III. Adjacency to Plan Area A Does Not Establish Compatibility with the HCP/NCCP - the Project Abuts Reserve Acquisition Area, Not Growth Area

The Draft EIR observes that the Project site "is immediately adjacent to Plan Area A" of the HCP/NCCP. (DEIR,§ 3.5.1, p. 3.5-6.) The Authority agrees that the Project site is adjacent to, but not within, Plan Area A. The point we wish to make is that adjacency to Plan Area A says nothing, by itself, about whether the Project is compatible with the conservation lands it abuts.

Plan Area A is the portion of the HCP/NCCP where future growth and most covered activities are anticipated, but it is **not** uniformly a development area. Plan Area A contains two fundamentally different kinds of land designation under the HCP/NCCP: **Potential Future Growth ("PFG")**, where the HCP/NCCP anticipates that development will occur; and **Reserve Acquisition Areas ("RAA")**, where the HCP/NCCP instead anticipates that land will be conserved and incorporated into the reserve system. The Plan's conservation strategy uses fees generated by development in the PFG areas to acquire and protect land in the RAA. Whether a project is compatible with the Plan therefore depends not on its general proximity to Plan Area A, but on whether it abuts PFG land or RAA land.

Here, the land adjacent to the Project is **Reserve Acquisition Area, not Potential Future Growth area**. The Draft EIR's own analysis confirms this: it identifies Mourier West as "the nearest PCCP Reserve Acquisition Area," roughly 930 feet to the north. (DEIR, § 3.5.3, p. 3.5-22.) The Mourier West and Clemetson properties are reserve-acquisition lands the Authority has secured for conservation - the Plan does not contemplate their development; it contemplates their permanent protection and restoration. That the adjacent Plan land is reserve-acquisition land slated for conservation heightens, rather than relieves, the City's obligation to analyze and minimize the Project's urban-edge effects on it.

Response A8-8

The comment states that the project's adjacency to PCCP Plan Area A does not demonstrate compatibility with the HCP/NCCP because the lands adjacent to the Project are Reserve Acquisition Areas intended for conservation rather than Potential Future Growth areas intended for development. The comment also states that the project's proximity to conservation lands increases the need to analyze and minimize potential urban-edge effects on those lands.

As discussed in the responses to the preceding comments regarding the PCCP, adjacent reserve lands, and HCP/NCCP consistency (see responses to comments A3-5 through A3-7 and responses in this comment letter), the Draft EIR recognizes the project’s proximity to PCCP lands but also correctly notes that the project site is not located within the PCCP plan area and is not subject to PCCP’s permit requirements, conservation strategy, or mitigation framework. Accordingly, the project would not conflict with the provisions of an applicable adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan because it is not subject to those plans. However, the Draft EIR evaluates the project’s potential physical effects on biological resources. Consistent with CEQA, the Draft EIR’s evaluation of biological resources is based on the project's potential physical effects on environmental resources, including direct and indirect impacts to special-status species, sensitive habitats, wildlife movement, lighting, noise, human disturbance, hydrology, and other relevant impact mechanisms.

As described in response to comment A3-7, although the project is not required to comply with the PCCP’s Development Interface Design Requirements, the City has decided to incorporate applicable Development Interface Design Requirements identified in PCCP Section 6.3.1.2.1 into the final project design as a voluntary measure to further minimize potential indirect effects on adjacent reserve lands (this portion of the PCCP is appended to this

Final EIR as Appendix A). These measures will supplement the mitigation measures already identified in the Draft EIR and will help reduce the potential for edge effects such as wildlife disturbance, lighting impacts, unauthorized access, invasive species introduction, and other indirect effects on adjacent biological resources. With incorporation of these design measures and implementation of the mitigation measures identified in the Draft EIR (as revised in the Final EIR), the project's potential indirect impacts on adjacent biological resources would be avoided or minimized.

The character of adjacent lands is relevant to understanding the environmental setting. However, for the reasons discussed in the responses above, the Draft EIR evaluates the potential effects of the project on adjacent biological resources regardless of whether neighboring lands are designated for conservation, agriculture, or other uses. The comment does not provide substantial evidence demonstrating that adjacency to PCCP Reserve Acquisition Areas would result in significant impacts beyond those evaluated in the Draft EIR or require additional mitigation measures. Accordingly, the Draft EIR adequately addresses the project's potential effects on adjacent biological resources consistent with CEQA, and no changes to the Draft EIR are required.

Comment A8-9

IV. Clemetson and Mourier West Are Protected Wildlife Habitat in a Regional Reserve System

It bears emphasis, because the Draft EIR overlooks it, that the Clemetson and Mourier West properties are part of a permitted, regional habitat reserve assembled under the HCP/NCCP and managed in perpetuity for the conservation of covered species and natural communities. They are not only farmland. They anchor an approximately 4,116-acre block of conservation lands designed to link the Pleasant Grove Creek corridor with surrounding reserves and to sustain nesting and foraging habitat for Swainson's hawk, tricolored blackbird, burrowing owl, and other listed species, and Mourier West and Clemetson support protected vernal pool species, including vernal pool fairy shrimp. Their conservation value depends on protection from the very edge effects adjacent urbanization introduces - altered hydrology and drainage, artificial night lighting, elevated noise, human and pet intrusion, trash and predator subsidies, and colonization by invasive plants and animals.

The Draft EIR's omission is especially consequential because the Pleasant Grove Creek corridor between the Project and Mourier West is not merely an existing resource to be protected; under the goals and objectives of the PCCP, that stream corridor and its floodplain are planned to be restored and enhanced with shaded riverine and riparian habitat to improve water quality, temperature, turbidity, and other benefits to covered species. In addition, both Clemetson and Mourier West are likely locations for the creation or restoration of vernal pool grasslands, another key goal of the PCCP. Project edge effects could undermine not only existing habitat values but also this planned restoration. The Final EIR should describe these properties accurately as protected reserve lands and analyze the Project's effects on their habitat values and planned enhancement, rather than folding them into a generic category of surrounding "agricultural land."

Response A8-9

The comment states that the Clemetson and Mourier West properties are protected conservation lands within the PCCP reserve system that provide habitat for covered species and support broader conservation and restoration objectives. The comment also states that the Draft EIR does not adequately recognize the conservation status of these properties or evaluate the project's potential indirect effects on their existing and planned habitat values.

As discussed in the responses to the preceding comments regarding the PCCP, adjacent reserve lands, and indirect effects (see responses to comments A3-5 through A3-7 and responses in this comment letter), the Draft EIR evaluates the project's potential direct and indirect impacts on biological resources that could occur in the project vicinity, including impacts related to habitat disturbance, hydrology, lighting, noise, wildlife movement, invasive species, and human activity. The significance determinations are based on the potential effects of the project on environmental resources rather than on the ownership, management, or conservation status of adjacent properties.

The City recognizes the conservation value of the Clemetson and Mourier West properties. However, the comment does not provide substantial evidence demonstrating that the project would result in significant impacts to those properties or their conservation objectives beyond the impacts already analyzed in the Draft EIR. For the reasons

discussed in the responses above, the Draft EIR adequately evaluates the project's potential effects on adjacent biological resources and habitat values consistent with CEQA. Accordingly, no changes to the Draft EIR are required.

Comment A8-10

V. The Fencing Proposed in the Draft EIR Has Not Been Shown to Be Adequate to Protect Reserve Habitat

The Draft EIR describes perimeter fencing as "a six-foot-tall chain-link fence, or equivalent," with optional screening, installed principally "[t]o minimize trespassing into Pleasant Grove Creek" and to "help maintain potential debris within the project site." (DEIR, §§ 2.4.5, p. 2-19, 3.5, p. 3.5-26.) This fencing is described as a security and litter-containment feature oriented toward the creek; the Draft EIR does not analyze whether it would minimize habitat impacts to the Clemetson (west) or Mourier West (north) reserve lands. Standard chain-link security fencing is not designed to address light spillover, noise, drainage, or the movement of invasive species or nuisance predators into adjacent habitat, and it may itself impede the movement of small reserve-dependent wildlife if not appropriately designed.

On the present record, the Authority cannot conclude that the proposed fencing would adequately protect habitat on Clemetson and Mourier West, because the Draft EIR does not assess it for that purpose. The Authority therefore requests that the Final EIR (i) expressly evaluate the adequacy of any proposed fencing as a measure to minimize impacts to the adjacent reserve lands, and (ii) commit to fencing along the northern and western reserve interfaces that is designed for habitat protection - for example, wildlife-appropriate fencing that deters human and domestic-animal intrusion and contains debris while still permitting necessary movement of small native wildlife - with the specific design developed in coordination with the Authority.

Response A8-10

The comment questions whether the perimeter fencing described in the Draft EIR would adequately protect adjacent PCCP reserve lands and recommends evaluating the fencing's effectiveness at minimizing impacts to the Clemetson and Mourier West properties. The comment further recommends habitat-oriented fencing along the northern and western project boundaries and coordination with PCA regarding fencing design.

As discussed in the responses to the preceding comments regarding adjacent PCCP reserve lands and indirect effects (see responses to comments A3-5 through A3-7 and responses in this comment letter), the Draft EIR evaluates the project's potential direct and indirect impacts on biological resources and identifies measures to reduce impacts associated with habitat disturbance, trespass, debris, lighting, noise, and other potential edge effects.

Page 2-19 of the Draft EIR describes the proposed perimeter and internal fencing for the project site, including six-foot-tall chain-link fencing (or equivalent), controlled access gates, and separate fencing for operational areas. The purpose of these features includes site security, access control, and reduction of unauthorized access to adjacent areas. This kind of access control fencing is required by solid waste regulations for the solid waste facility elements, but is not intended to be applied blanketly around the outermost perimeter of the entire project site if more suitable fencing is warranted.

The comment recommends that fencing along the northern and western project boundaries be evaluated from the perspective of habitat protection and compatibility with adjacent conservation lands. The Draft EIR already includes measures intended to reduce indirect effects on adjacent biological resources, including, but not limited to, implementation of wildlife-friendly building design (Mitigation Measure 3.5-5); limitations on outdoor lighting and light spillover (Mitigation Measures 3.1-2 and 3.5-5); avoidance and minimization measures for special-status species and nesting birds (Mitigation Measures 3.5-1 and 3.5-2a through 3.5-2j); and other mitigation measures designed to protect adjacent environmental resources (Mitigation Measures 3.5-3, 3.5-4a, 3.5-4b, and 3.5-6). Perimeter fencing is one component of this broader impact avoidance and minimization strategy because it would help separate project operations from adjacent reserve properties. By limiting access from the project site to adjacent reserve properties, fencing would reduce the potential for project employees, visitors, vehicles, and equipment to enter and disturb sensitive habitats and wildlife on nearby reserve properties. Fencing would also limit the movement of some wildlife from adjacent reserve properties onto the project site, thereby reducing the potential for wildlife exposure to project-related hazards, including vehicle traffic, equipment operations, and other human activities. Perimeter fencing would

provide an additional layer of protection beyond the mitigation measures identified in the Draft EIR by helping to reduce indirect effects on adjacent biological resources.

For the reasons discussed in the responses cited above, the Draft EIR adequately evaluates the project's potential impacts on adjacent biological resources. Accordingly, no additional changes to the Draft EIR are required, except as may be incorporated through project refinements.

See also responses to comments A3-7 and A8-12 through A8-16 regarding the City's commitment to incorporate applicable PCCP Development Interface Design Requirements and continue coordination with PCA regarding development interface measures intended to minimize potential impacts on adjacent reserve properties.

Comment A8-11

VI. The Lighting Standards Proposed in the Draft EIR Have Not Been Shown to Be Adequate to Protect Reserve Habitat

The Draft EIR's lighting measures - Mitigation Measure 3.1-2 (full-cutoff, U0-lens fixtures, height limits, non-reflective surfaces) and Mitigation Measure 3.5-5 (wildlife-friendly building design; screening of light "directed perpendicular to Pleasant Grove Creek"; minimizing "light spillage from the project during operation into Pleasant Grove Creek") - are directed at human nighttime views, skyglow, and the riparian corridor to the north. (DEIR, §§ 3.1, 3.5.) The Draft EIR does not analyze whether these standards would minimize light-related impacts to the reserve habitat on Clemetson (west) or Mourier West (north). General Plan Policy LU7.9 (avoiding spill-over lighting onto "adjacent properties") is invoked, but the Draft EIR does not apply it to the reserve lands or evaluate its sufficiency for protecting habitat values. Notably, the City has already concluded that the Project's cumulative light-and-glare impact is significant and unavoidable - which only underscores the need to analyze, and minimize, lighting effects at the reserve interfaces.

Artificial lighting is a well-recognized edge effect that alters the behavior of nocturnal and crepuscular wildlife, disrupts movement and foraging, and degrades habitat quality at distances comparable to the roughly 930 feet between the development area and Mourier West. Because the Draft EIR does not assess its lighting standards against the habitat values of the adjacent reserve, the Authority cannot conclude that those standards are adequate. The Authority requests that the Final EIR evaluate the adequacy of the proposed lighting standards and guidelines as measures to minimize impacts to Clemetson and Mourier West, and that the Project's lighting be designed, placed, and operated to minimize spillover toward those reserve lands - including full shielding and downward direction of fixtures along the northern and western boundaries, the lowest feasible mounting heights and lumen levels at those edges, warmer color temperatures (e.g., 2700K or lower), and controls (timers, motion sensors, and curfews) that limit nighttime illumination to what safety and operations actually require.

Response A8-11

The comment states that the Draft EIR's lighting measures are focused on reducing impacts to Pleasant Grove Creek and human nighttime views, and that the Draft EIR does not adequately evaluate whether the proposed lighting standards would minimize light-related effects on the adjacent Clemetson and Mourier West reserve lands. The comment recommends evaluating lighting impacts at the reserve interfaces and incorporating additional measures to minimize light spillover onto adjacent habitat areas.

Specifically, Mitigation Measure 3.5-5 in the Draft EIR requires implementation of wildlife-friendly building design principles, screening of construction lighting and vehicle headlights along the northern portion of the site, and operational lighting controls that require outdoor lighting to be shielded, directed only where illumination is needed, and limited to the minimum wattage necessary. In addition, Mitigation Measure 3.1-2 requires use of full-cutoff fixtures with U0 lenses, placement of lighting to avoid light spillover and glare on adjacent properties, limitations on pole heights, and use of nonreflective building materials. Collectively, these measures are intended to minimize off-site light trespass and reduce the potential for indirect effects on adjacent sensitive habitats and wildlife resources, including habitats located north and west of the project site.

The identified lighting standards would apply to project lighting generally and are intended to minimize light spillover, glare, and skyglow throughout the project area. Full-cutoff fixtures with U0 lenses emit no light above the horizontal plane, while shielding requirements, limitations on fixture heights, and minimum necessary wattage

requirements further reduce the potential for light trespass onto adjacent properties and habitat areas. These measures are consistent with the types of lighting controls identified by the comment, including shielding, directional lighting, minimizing light intensity, and limiting unnecessary nighttime illumination.

In addition, although a site-specific lighting plan has not been prepared yet, the Draft EIR evaluates the project's reasonably foreseeable lighting impacts and identifies mitigation measures that would guide future lighting design. The incorporation of wildlife-friendly building design principles and applicable PCCP Development Interface Design Requirements would further minimize the potential for lighting-related effects on adjacent reserve lands. Existing mature riparian vegetation along Pleasant Grove Creek would also provide substantial visual screening between the project and adjacent habitat areas.

For the reasons discussed in the responses above, the Draft EIR adequately evaluates the project's potential lighting-related impacts on biological resources. Accordingly, no additional changes to the Draft EIR are required, except as may be incorporated by the City through project refinements.

See also responses to comments A3-7 and A8-12 through A8-16 regarding the City's commitment to incorporate applicable PCCP Development Interface Design Requirements and continue coordination with PCA regarding development interface measures intended to minimize potential impacts on adjacent reserve properties.

Comment A8-12

VII. Recommended Measures to Avoid and Minimize Impacts to the Reserve System

CEQA requires that significant effects be avoided or substantially lessened through feasible, enforceable mitigation. (Pub. Resources Code,§ 21002; CEQA Guidelines, §§ 15126.4, subd. (a), 15370.) The Authority respectfully urges the City to incorporate the following measures into the Project description and the Final EIR's mitigation program:

1. **On-site setbacks.** Establish meaningful, enforceable setbacks along the northern (Mourier West) and western (Clemetson) Project boundaries that distance buildings, lighting, paving, traffic, staging, and operations from the reserve lands, and that provide a vegetated buffer to attenuate noise, light, and human intrusion. The Draft EIR's existing setbacks are oriented to Phillip Road and Pleasant Grove Creek and do not buffer the western reserve interface.

Response A8-12

The comment recommends incorporating additional measures to avoid and minimize potential impacts on adjacent PCCP reserve lands, including establishment of meaningful setbacks and vegetated buffers along the northern and western project boundaries to separate project facilities and activities from nearby conservation lands and reduce potential edge effects.

In July 2026, City and PCA staff met to discuss PCA's concerns regarding potential edge effects on the adjacent reserve properties. The City committed to continuing coordination with PCA as project design progresses to evaluate development interface measures and incorporate feasible design features that would minimize potential impacts on adjacent reserve properties. Such measures may include setbacks, fencing and other barriers, buffers, lighting design, drainage features, landscaping, site layout, and other measures intended to reduce potential edge effects and protect biological resources.

Comment A8-13

2. **Habitat-protective fencing.** Provide fencing along the reserve interfaces specifically designed to deter human and domestic-animal entry into the reserve, contain trash and debris, and avoid impeding the movement of small native wildlife, with design and placement coordinated with the Authority.

Response A8-13

The comment recommends installation of habitat-protective fencing along the boundaries adjacent to PCCP reserve lands to discourage human and domestic-animal intrusion, contain trash and debris, facilitate movement of small native wildlife, and be designed in coordination with PCA.

As described in response to comment A8-12, the City committed to continuing coordination with PCA as project design progresses to evaluate development interface measures and incorporate feasible design features that would minimize potential impacts on adjacent reserve properties. Such measures may include setbacks, fencing and other barriers, buffers, lighting design, drainage features, landscaping, site layout, and other measures intended to reduce potential edge effects and protect biological resources.

Comment A8-14

3. **Lighting design, placement, and use**. Design, locate, and operate Project lighting to minimize spillover and skyglow toward the reserve - fully shielded, downward-directed, full-cutoff fixtures; minimized mounting heights and lumen output along the northern and western edges; warm color temperatures; and timers, motion sensors, and operational curfews to limit unnecessary nighttime illumination.

Response A8-14

The comment recommends that project lighting be designed, located, and operated to minimize light spillover and skyglow onto adjacent PCCP reserve lands, including use of fully shielded, downward-directed fixtures, lower mounting heights and light levels near reserve boundaries, warmer color temperatures, and lighting controls such as timers, motion sensors, and curfews.

As described in response to comment A8-12, the City committed to continuing coordination with PCA as project design progresses to evaluate development interface measures and incorporate feasible design features that would minimize potential impacts on adjacent reserve properties. Such measures may include setbacks, fencing and other barriers, buffers, lighting design, drainage features, landscaping, site layout, and other measures intended to reduce potential edge effects and protect biological resources.

Also, in response to other comments, Mitigation Measure 3.5-5 has been expanded to also apply to the nearby reserve properties to minimize lighting impacts. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes.

Comment A8-15

4. **Drainage, invasive species, and nuisance-wildlife controls**. Ensure that altered surface and storm drainage does not discharge toward or alter the hydrology of the reserve lands or the Pleasant Grove Creek corridor planned for restoration; require locally appropriate, non-invasive landscaping and an invasive-species management commitment along the interface; and extend nuisance-wildlife and refuse-management practices to protect the reserve, not only the creek.

Response A8-15

The comment recommends measures to protect adjacent PCCP reserve lands by ensuring project drainage does not adversely affect reserve lands or the Pleasant Grove Creek corridor, implementing non-invasive landscaping and invasive species management practices along the project boundary, and extending refuse management and nuisance wildlife control measures to minimize impacts on adjacent conservation areas.

As described in response to comment A8-12, the City committed to continuing coordination with PCA as project design progresses to evaluate development interface measures and incorporate feasible design features that would minimize potential impacts on adjacent reserve properties. Such measures may include setbacks, fencing and other barriers, buffers, lighting design, drainage features, landscaping, site layout, and other measures intended to reduce potential edge effects and protect biological resources.

Also, in response to other comments, Mitigation Measure 3.5-4b has been revised to include a requirement for the City to prepare a hydrologic study to characterize existing site hydrology and ensure that project implementation and operation would not result in a substantial change to off-site hydrologic conditions. See Chapter 3, "Revisions to the Draft EIR," of this Final EIR for the text changes.

Comment A8-16
VIII. Request That the City Consult HCP/NCCP Section 6.3.1.2 for Guidance

Although the Project is not subject to the requirements of the HCP/NCCP, Section 6.3.1.2 of the Plan - the Development Interface Design Requirements - was developed precisely to address the situation presented here: development located next to HCP/NCCP reserve-system land. That section sets out measures intended to minimize the effects of adjacent development on reserve lands, including the kinds of interface controls discussed above - setbacks and buffers, drainage and water-quality management, lighting design to limit spillover, fencing, noise attenuation, invasive-species and landscaping controls, and limits on human access. The Authority respectfully requests that the City review Section 6.3.1.2 and use it as a template and a source of substantial evidence for designing and evaluating measures to protect Clemetson and Mourier West, even though compliance is not mandatory for this Project. Doing so will strengthen both the Project design and the adequacy of the Final El R's analysis.

Response A8-16
The comment recommends that the City review and consider the HCP/NCCP Development Interface Design Requirements (Section 6.3.1.2) as guidance for addressing potential interface effects between the project and adjacent PCCP reserve lands, even though the project is not subject to the HCP/NCCP.

The City recognizes that Section 6.3.1.2 of the HCP/NCCP contains guidance intended to address potential edge effects associated with development adjacent to conservation lands. As discussed in response to comment A3-7, although the project is not required to comply with the PCCP's Development Interface Design Requirements, the City has decided to incorporate applicable Development Interface Design Requirements identified in PCCP Section 6.3.1.2.1 into the final project design as a voluntary measure to further minimize potential indirect effects on adjacent reserve lands.

As discussed throughout the responses to comments regarding adjacent PCCP reserve lands (see responses to comments A3-5 through A3-7 and responses in this comment letter), the Draft EIR evaluates the project's potential direct and indirect impacts on biological resources and includes measures to reduce impacts associated with lighting, habitat disturbance, human intrusion, stormwater management, wildlife movement, and other environmental considerations. The comment does not identify a deficiency in the CEQA analysis or demonstrate that incorporation of the HCP/NCCP interface standards is required to support the Draft EIR's conclusions. Accordingly, no changes to the Draft EIR are required.

Comment A8-17
IX. Offer to Collaborate

The Authority raises these concerns in a spirit of cooperation. We share the City's interest in a well-designed Project, and we are confident that the impacts identified above can be avoided or substantially minimized through the measures described. The Authority's staff would welcome the opportunity to meet with the City and the Project team - promptly, and before the Final EIR is prepared - to discuss appropriate setbacks, fencing, lighting, drainage, and interface measures; to share reserve-management information and the goals of the Mourier West and Clemetson acquisitions and the planned Pleasant Grove Creek corridor enhancement; and to assist the City in applying the guidance in Section 6.3.1.2. We stand ready to provide whatever information would be helpful.

Response A8-17
The comment recommends coordination with PCA regarding project design features adjacent to PCCP reserve lands, including setbacks, fencing, lighting, drainage, and other interface measures. The comment also offers to share information regarding reserve management and conservation objectives for the Clemetson and Mourier West properties.

The City appreciates PCA's continued participation in the environmental review process and its offer to provide information regarding adjacent conservation lands and management objectives. As described in response to comment A8-12, the City has committed to continuing coordination with PCA as project design progresses to

evaluate development interface measures and incorporate feasible design features that would minimize potential impacts on adjacent reserve properties. The comment does not identify a deficiency in the environmental analysis or require revisions to the Draft EIR. Therefore, no changes to the Draft EIR are required.

Comment A8-18

X. Conclusion

For the reasons stated, the Authority respectfully requests that the City revise the environmental analysis to (1) accurately describe Clemetson and Mourier West as protected reserve lands within a regional conservation block; (2) analyze, on substantial evidence, the Project's direct and indirect effects on the habitat values of those lands - including effects from hydrology, lighting, noise, human intrusion, and invasive species, and effects on the planned Pleasant Grove Creek corridor enhancement and vernal pool restoration on Clemetson and Mourier West; (3) assess the adequacy of the proposed fencing and lighting standards as measures to protect those lands, or commit to doing so in the Final EIR; and (4) adopt feasible, enforceable measures - setbacks, habitat-protective fencing, and lighting design, placement, and use - to avoid and minimize those effects. Because these issues go to the adequacy of the EIR as an informational document, the City must provide a written response to each of these comments, and should recirculate the EIR if revisions add significant new information. (CEQA Guidelines, §§ 15088, subd. (c), 15151, 15088.5.)

Thank you for your consideration of these comments. Please include the Authority in the distribution list for all future notices and documents concerning this Project, and please direct any questions to the undersigned.

Response A8-18

The comment requests that the City revise the analysis of adjacent PCCP reserve lands, evaluate potential direct and indirect effects on those lands, assess the adequacy of proposed fencing and lighting measures, adopt additional avoidance and minimization measures, provide written responses to comments, and recirculate the EIR if significant new information is added.

As discussed in responses to comments A3-5 through A3-7 and A8-2 through A8-17, the Draft EIR analyzes the project's potential physical effects on adjacent biological resources, including resources located on nearby PCCP reserve properties, regardless of whether the project is subject to PCCP's permit requirements, conservation strategy, or mitigation framework.

As discussed in the responses to comments A8-1 through A8-17, the City has carefully considered PCA's concerns regarding the project's proximity to the Clemetson and Mourier West properties and the potential for indirect effects on adjacent biological resources. The City has evaluated the comments and recommendations regarding the environmental analysis, fencing, lighting, setbacks, drainage, and other interface measures.

As described in response to comment A8-12, the City committed to continuing coordination with PCA as project design progresses to evaluate development interface measures and incorporate feasible design features that would minimize potential impacts on adjacent reserve properties. Such measures may include setbacks, fencing and other barriers, buffers, lighting design, drainage features, landscaping, site layout, and other measures intended to reduce potential edge effects and protect biological resources.

The Draft EIR adequately evaluates the project's potential impacts on biological resources, including potential indirect effects, consistent with CEQA. As described above, the City has committed to continuing coordination with PCA during project design to evaluate development interface measures and incorporate feasible design features that would minimize potential impacts on adjacent reserve properties. Any such project refinements would be considered during future project design. To the extent additional environmental review is required following certification of the EIR, the City would evaluate such refinements in accordance with CEQA Guidelines Sections 15162, 15163, and 15164. These refinements would be intended to further reduce or avoid potential impacts and would not, in themselves, result in new or more severe environmental impacts than those analyzed in the Draft EIR. The City will provide written responses to comments as required by CEQA and will continue to provide notices and environmental documents in accordance with applicable CEQA requirements.

Accordingly, except for any project refinements that may be identified by the City, no additional revisions to the environmental analysis are required.

2.2.3 Companies

Letter C1 Pacific Gas & Electric

Plan Review Team, Land Management
May 12, 2026

Comment C1-1

Thank you for submitting the **Roseville Environmental Utilities Operations Center** project plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en/account/service-requests/building-and-renovation.html.
2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.
3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851filing is required.

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

Response C1-1

The comment states that PG&E reviewed the submitted project plans for potential conflicts with existing gas and electric facilities and will coordinate with the City to ensure compatible uses near its infrastructure and within any easements. The comment further states that the City should review the attached gas and electric facility requirements, continue separate service application processes, and include the full project scope and PG&E infrastructure in CEQA documentation. Because no specific issues related to the content, analysis, or conclusions in the Draft EIR are raised in this comment, no further response is provided here.

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3 REVISIONS TO THE DRAFT EIR

This chapter presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number.

The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute "significant new information" requiring recirculation. (See Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

3.1 REVISIONS TO THE EXECUTIVE SUMMARY

In response to comments A3-3 and A3-4, and to provide an update to reflect the potential for occurrence of western burrowing owl, a new mitigation measure is added to Table ES-2 on page ES-10 of the Draft EIR as follows:

Original:

Table ES-2 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Biological Resources			
Impact 3.5-2: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat	Phase 1: PS Phase 2: PS	Mitigation Measure 3.5-2a: Conduct Preconstruction Surveys for Northwestern Pond Turtle, Implement Avoidance Measures, and Relocate Individuals Mitigation Measure 3.5-2b: Provide Stream Setbacks, Best Management Practices Mitigation Measure 3.5-2c: Develop and Integrate a Nuisance Wildlife Management Plan into the City's Environmental Utilities Facility Management Plan Mitigation Measure 3.5-2d: Conduct Preconstruction Surveys for Western Spadefoot, Implement Avoidance Measures, and Relocate Individuals (Phase 1 only) Mitigation Measure 3.5-2e: Conduct Pre-construction Vernal Pool Avoidance Surveys, Protocol-Level Branchiopod Surveys, and Compensate for Loss of Vernal Pool Branchiopods (Phase 1 only) Mitigation Measure 3.5-2f: Conduct Take Avoidance Surveys for Crotch's Bumble Bee and Implement Avoidance Measures Mitigation Measure 3.5-2g: Conduct Take Avoidance Survey for Monarch Eggs, Larvae and Pupae, and Implement Avoidance Measures Mitigation Measure 3.5-2h: Conduct Focused Surveys for Special-Status Birds, Nesting Raptors, and Other Native Nesting Birds and Implement Protective Buffers; and Mitigate for the Loss of Swainson's Hawk Foraging Habitat Mitigation Measure 3.5-2i: Conduct Focused Surveys for Northern California Ringtail Dens and Implement Avoidance Measures Mitigation Measure 3.5-2j: Conduct Focused Bat Surveys and Implement Avoidance Measures	Phase 1: LTS Phase 2: LTS

Revised:

Table ES-2 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Biological Resources			
Impact 3.5-2: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat	Phase 1: PS Phase 2: PS	Mitigation Measure 3.5-2a: Conduct Preconstruction Surveys for Northwestern Pond Turtle, Implement Avoidance Measures, and Relocate Individuals Mitigation Measure 3.5-2b: Provide Stream Setbacks, Best Management Practices Mitigation Measure 3.5-2c: Develop and Integrate a Nuisance Wildlife Management Plan into the City's Environmental Utilities Facility Management Plan Mitigation Measure 3.5-2d: Conduct Preconstruction Surveys for Western Spadefoot, Implement Avoidance Measures, and Relocate Individuals (Phase 1 only) Mitigation Measure 3.5-2e: Conduct Pre-construction Vernal Pool Avoidance Surveys, Protocol-Level Branchiopod Surveys, and Compensate for Loss of Vernal Pool Branchiopods (Phase 1 only) Mitigation Measure 3.5-2f: Conduct Take Avoidance Surveys for Crotch's Bumble Bee and Implement Avoidance Measures Mitigation Measure 3.5-2g: Conduct Take Avoidance Survey for Monarch Eggs, Larvae and Pupae, and Implement Avoidance Measures Mitigation Measure 3.5-2h: Conduct Focused Surveys for Special-Status Birds, Nesting Raptors, and Other Native Nesting Birds and Implement Protective Buffers; and Mitigate for the Loss of Swainson's Hawk Foraging Habitat Mitigation Measure 3.5-2i: Conduct Focused Surveys for Northern California Ringtail Dens and Implement Avoidance Measures Mitigation Measure 3.5-2j: Conduct Focused Bat Surveys and Implement Avoidance Measures Mitigation Measure 3.5-2k: Conduct Preconstruction Surveys for Western Burrowing Owl and Implement Avoidance Measures	Phase 1: LTS Phase 2: LTS

3.2 REVISIONS TO CHAPTER 2, "PROJECT DESCRIPTION"

In response to comment A5-11 and to describe the anticipated origin of the biomass, the description of the potential future biomass facility on page 2-18 of the Draft EIR is revised as follows:

Original:

POTENTIAL FUTURE BIOMASS FACILITY

Another potential future strategy for managing organic wastes is the development of a Biomass Facility. The Biomass Facility would be evaluated by the City on its financial, environmental, and regulatory merits and, if determined to be in the best interest of the City, would be developed at a later time. Its purpose would be to convert biomass (woody material) into energy using thermal means. The specific type of device has yet to be

selected but for the purposes of this analysis, it is assumed that the biomass facility would handle organic (i.e., food and agricultural) as well as yard-trimming waste. In the event that a biomass facility is proposed at a later date, additional subsequent environmental analysis may be necessary. The potential future Biomass Facility would be co-located in the same area as the potential future Compost Facility.

Revised:

POTENTIAL FUTURE BIOMASS FACILITY

Another potential future strategy for managing organic wastes is the development of a Biomass Facility. The Biomass Facility would be evaluated by the City on its financial, environmental, and regulatory merits and, if determined to be in the best interest of the City, would be developed at a later time. Its purpose would be to convert biomass (woody material) into energy using thermal means. The specific type of device has yet to be selected but for the purposes of this analysis, it is assumed that the biomass facility would handle organic (i.e., food and agricultural) as well as yard-trimming waste. For purposes of this Draft EIR, the biomass feedstock is assumed to consist primarily of locally generated green waste (yard waste) collected from City residents and commercial customers within the City's service area. Accordingly, biomass feedstock is not expected to originate from distant agricultural or forestry operations.

In the event that a biomass facility is proposed at a later date, additional subsequent environmental analysis may be necessary. The potential future Biomass Facility would be co-located in the same area as the potential future Compost Facility.

In response to comment A4-7 and to acknowledge the potential need for County-issued permits and approvals for activities occurring within County jurisdiction or with the potential to directly or indirectly affect County assets or customers, the list of potential permits and approvals required for the project on page 2-26 of the Draft EIR is revised as follows:

Original:

- Placer County: Integrated Waste Management Plan
  - To comply with the Non-Disposal Facility Element, the facility must be added to the County's Integrated Waste Management Plan to confirm it is not a disposal facility.

Revised:

- Placer County: To the extent project improvements, utility work, construction access, or other activities occur within Placer County jurisdiction or with the potential to directly or indirectly affect County assets or customers, the City would be required to obtain all applicable permits and approvals from Placer County, which may include encroachment permits, improvement plan review and approval, or other permits as determined appropriate by the County; and revisions to the County's Integrated Waste Management Plan
  - To comply with the Non-Disposal Facility Element, the facility must be added to the County's Integrated Waste Management Plan to confirm it is not a disposal facility.

3.3 REVISIONS TO SECTION 3.3, "AIR QUALITY"

In response to comment A5-9, the bulleted list on pages 3.3-7 through 3.3-8 is revised as follows to add the following new bullets:

Revised:

- PCAPCD Rule 214 Transfer of Gasoline into Stationary Storage Containers: The provisions of this rule shall apply to the transfer of gasoline from any stationary storage tank into any motor vehicle fuel tank.

- **PCAPCD Rule 501, General Permit Requirements:** To provide an orderly procedure for the review of new stationary sources of air pollution and modification and operation of existing sources through the issuance of permits. Stationary sources which would emit more than 2 pounds in any 24 hour period of any pollutants would be subject to the District's permit requirement.
- **PCAPCD Rule 502, New Source Review:** The purpose of this rule is to provide for the review of new and modified stationary sources of air pollution and to provide mechanisms, including emission offsets, to ensure that construction and operation of such sources do not interfere with the attainment or maintenance of air quality standards. The rule applies to all new stationary sources and emissions units and all modifications to existing stationary sources and emissions units that, after construction, emit or may emit any New Source Review regulated pollutant within the PCAPCD. The rule establishes requirements for preconstruction permitting, emission controls, and, where applicable, emissions offsets for qualifying sources.
- **PCAPCD Rule 503, Emission Statement:** The purpose of this rule is to establish the requirements for the submittal of emission statements from specified stationary sources pursuant to the requirements of the 1990 amendments to the Federal Clean Air Act [Section 182 (a)(3)(B)]. The requirements of this rule are applicable to every stationary source which has actual emissions or potential in excess of the 10 tons per year of volatile organic compounds (VOC) or oxides of nitrogen (NOx) within the PCAPCD. Those with emissions above specified thresholds are required to submit annual emission statements and operational information to the District for emissions inventory and air quality planning purposes.
- **PCAPCD Rule 507, Federal Operating Permit Program:** The purpose of this rule is to establish procedures and requirements for an operating permit system consistent with the requirements of Title V of the Federal Clean Air Act (CAA), as amended in 1990, and pursuant to 40 CFR Part 70. Rule 507 establishes procedures and requirements for obtaining and maintaining Title V operating permits for major stationary sources and other sources subject to federal operating permit requirements, ensuring compliance with applicable federal, state, and local air quality regulations.

In response to comment A5-10, the paragraph that breaks across pages 3.3-8 and 3.3-9 of the Draft EIR is revised as follows:

Original:

PCAPCD is located within the federally designated Sacramento Federal Ozone Nonattainment Area (SFNA) for air quality planning purposes. This is primarily because emissions generated within Placer County may affect the nearby Sacramento-Metropolitan Area. As a part of the SFNA, PCAPCD works with Sacramento Metropolitan Air Quality Management District (SMAQMD) and the other local air districts within the Sacramento area to develop a regional air quality management plan under CAA requirements. This management plan is called a SIP which describes and demonstrates how Placer County, as well as the Sacramento nonattainment area, would attain the required federal 8-hour ozone standard by the required attainment deadline. At a public meeting held on October 26, 2023, CARB voted to approve the Sacramento Regional 70 parts per billion (ppb) 8-Hour Ozone Attainment and Reasonable Further Progress Plan. The Sacramento Regional 70 ppb 8-Hour Ozone Attainment and Reasonable Further Progress Plan was prepared by the five local air districts of the SFNA, including PCAPCD, with the support of CARB. This plan is an Air Quality Attainment Plan (AQAP) that is applicable to development in the project area. One of the proposed mitigation strategies in the SIP is to recommend and implement mitigation measures through the review of land use projects at the local level (PCAPCD 2017). PCAPCD also adopted the 2014 Reasonably Available Control Technology (RACT) State Implementation Plan Analysis and Federal Negative Declarations for 16 Control Technique Source Categories. CARB submitted the 2014 RACT SIP to the EPA as a revision to the California SIP.

Revised:

PCAPCD is located within the federally designated Sacramento Federal Ozone Nonattainment Area (SFNA) for air quality planning purposes. This is primarily because emissions generated within Placer County may

affect the nearby Sacramento-Metropolitan Area. As a part of the SFNA, PCAPCD works with Sacramento Metropolitan Air Quality Management District (SMAQMD) and the other local air districts within the Sacramento area to develop a regional air quality management plan under CAA requirements. This management plan is called a SIP which describes and demonstrates how Placer County, as well as the Sacramento nonattainment area, would attain the required federal 8-hour ozone standard by the required attainment deadline. At a public meeting held on October 26, 2023, CARB voted to approve the Sacramento Regional 70 parts per billion (ppb) 8-Hour Ozone Attainment and Reasonable Further Progress Plan. The Sacramento Regional 70 ppb 8-Hour Ozone Attainment and Reasonable Further Progress Plan was prepared by the five local air districts of the SFNA, including PCAPCD, with the support of CARB. This plan is an Air Quality Attainment Plan (AQAP) that is applicable to development in the project area. One of the proposed mitigation strategies in the SIP is to recommend and implement mitigation measures through the review of land use projects at the local level (PCAPCD 2017). PCAPCD also adopted the 2020 Demonstration of Reasonably Available Control Technology for the 2015 Ozone NAAQS (RACT SIP). CARB submitted the 2020 RACT SIP to the EPA as a revision to the California SIP. The 2020 RACT SIP reexamines the RACT determinations made in the previous RACT SIP for the 2008 ozone standard in light of any new additional information and to satisfy planning requirements associated with the 2015 federal 8-hour ozone standard.

In response to comment A5-13, the discussion of Impact 3.3-1 on page 3.3-22 of the Draft EIR is revised as follows:

Original:

As discussed above in Section 3.3.1, "Regulatory Setting," the SACOG MTP/SCS establishes a long-range development pattern that identifies the general location of different types of land uses, residential densities, and employment densities. The MTP/SCS addresses air quality by aligning transportation and land use planning with regional and State air quality goals. The SACOG 2025 MTP/SCS forecasts residential and employment growth throughout the City of Roseville and specifically identifies the area in which the project site is located as an established community projected for employment growth (SACOG 2026). The project does not include land use development that would result in population growth beyond what has already been anticipated and planned for, and, therefore, would not generate long-term emissions that would conflict with the applicable AQAP. Rather, the project would continue to serve the City's existing population and waste generation (Phase 1) and would be designed to accommodate increased growth anticipated in the City of Roseville, which is planned for in the 2035 Roseville General Plan. Because the project would not result in employment growth beyond that projected in the regional plan, the project would not conflict with or obstruct the implementation of the air quality plan. In addition, as discussed above for Phase 1, the existing land use designation for the project site is P/AQP and the zoning is PD. Phase 2 and full operation (2058) of the project would be consistent with the land use designations and zoning established in the City General Plan. Because the City General Plan was developed to guide growth in a manner that minimizes air pollution and protects public health and is the basis for the regional emissions forecasts and reduction targets in the AQAP, consistency with land uses and growth in the General Plan would also be consistency with the AQAP; thus, a project that is consistent with the General Plan would not impede attainment of air quality standards.

Revised:

Operation of the Potential Future Organics Processing Facility and Potential Future Biomass Gasification Facility could require permits from PCAPCD, including potentially a federal Title V operating permit if facility emissions exceed applicable federal major source thresholds. A Title V permit does not authorize emissions beyond those evaluated in this EIR; rather, it establishes federally enforceable operating conditions, monitoring, recordkeeping, reporting, and compliance requirements to ensure that a source complies with all applicable air quality regulations. Any facility subject to Title V permitting would also remain subject to applicable PCAPCD permitting requirements, emissions limits, and air quality regulations. Accordingly, the potential need for Title V permits would not, by itself, indicate that the project would conflict with or obstruct implementation of the Sacramento 2015 Regional 8-Hour Ozone Attainment and Reasonable Further

Progress Plan. Instead, any such facility would be required to demonstrate compliance with applicable federal, state, and local air quality requirements through the permitting process.

As discussed above in Section 3.3.1, "Regulatory Setting," the SACOG MTP/SCS establishes a long-range development pattern that identifies the general location of different types of land uses, residential densities, and employment densities. The MTP/SCS addresses air quality by aligning transportation and land use planning with regional and State air quality goals. The SACOG 2025 MTP/SCS forecasts residential and employment growth throughout the City of Roseville and specifically identifies the area in which the project site is located as an established community projected for employment growth (SACOG 2026). The project does not include land use development that would result in population growth beyond what has already been anticipated and planned for, and, therefore, would not generate long-term emissions that would conflict with the applicable AQAP. Rather, the project would continue to serve the City's existing population and waste generation (Phase 1) and would be designed to accommodate increased growth anticipated in the City of Roseville, which is planned for in the 2035 Roseville General Plan. Because the project would not result in employment growth beyond that projected in the regional plan, the project would not conflict with or obstruct the implementation of the air quality plan. In addition, as discussed above for Phase 1, the existing land use designation for the project site is P/AQP and the zoning is PD. Phase 2 and full operation (2058) of the project would be consistent with the land use designations and zoning established in the City General Plan. Because the City General Plan was developed to guide growth in a manner that minimizes air pollution and protects public health and is the basis for the regional emissions forecasts and reduction targets in the AQAP, consistency with land uses and growth in the General Plan would also be consistency with the AQAP; thus, a project that is consistent with the General Plan would not impede attainment of air quality standards. Further, any stationary sources requiring PCAPCD permits or federal Title V permits would be subject to applicable emissions control, monitoring, and compliance requirements intended to support attainment and maintenance of applicable air quality standards.

In response to comment A5-4 and to correct a typographical error, the second paragraph on page 3.3-32 of the Draft EIR is revised as follows:

Original:

Operational activity was modeled in the HRA to determine the maximum future risk exposure associated with full operation of the project. Full operation would include the maximum anticipated waste throughput of 660,00 tpy of waste, including 210,000 tpy of organics. Based on the anticipated 2.5 MW potential future biomass facility and estimated capacity of 12,000 tons of biomass per 1 MW, 30,000 tpy of organic waste was assumed to be processed through the potential future biomass facility. In addition, to handle the waste, on-site diesel equipment would be required at the potential future composting site, on-site diesel material trucks would be used to deliver and transfer material, gasoline and diesel dispensing would occur at the on-site fueling station, maintenance of equipment could result in VOC off-gassing emissions, and various TAC emissions would be associated with the potential future composting and biomass gasification facility.

Revised:

Operational activity was modeled in the HRA to determine the maximum future risk exposure associated with full operation of the project. Full operation would include the maximum anticipated waste throughput of 660,000 tpy of waste, including 210,000 tpy of organics. Based on the anticipated 2.5 MW potential future biomass facility and estimated capacity of 12,000 tons of biomass per 1 MW, 30,000 tpy of organic waste was assumed to be processed through the potential future biomass facility. In addition, to handle the waste, on-site diesel equipment would be required at the potential future composting site, on-site diesel material trucks would be used to deliver and transfer material, gasoline and diesel dispensing would occur at the on-site fueling station, maintenance of equipment could result in VOC off-gassing emissions, and various TAC emissions would be associated with the potential future composting and biomass gasification facility.

In response to comment A5-5 and to correct a typographical error, the last paragraph on page 3.3-32 of the Draft EIR is revised as follows:

Original:

As shown in Figure 3.3-3, cancer risk results are concentrated closer to the onsite equipment (orange and yellow contours) with some cancer risk estimates also associated with primary access roads (dark green). The modeling assumes that 90 percent of traffic would move west from the site, while 10 percent heads east. Refer to Appendix B for more details regarding modeling inputs.

Revised:

As shown in Figure 3.3-3, cancer risk results are concentrated closer to the onsite equipment (orange and yellow contours) with some cancer risk estimates also associated with primary access roads (dark green). The modeling assumes that 90 percent of traffic would move east from the site, while 10 percent heads west. Refer to Appendix B for more details regarding modeling inputs.

In response to comment A5-19 and to add the Placer County Air Pollution Control District's recommendations as examples of measures that may be incorporated into the Odor Reduction Plan, Mitigation Measure 3.3-5 beginning on page 3.3-39 of the Draft EIR is revised as follows:

Original:

Mitigation Measure 3.3-5: Implement Facility Odor Reduction Plan

Prior to commencement of operations involving municipal green waste and food organics, the City shall prepare, implement, and maintain a comprehensive Odor Reduction Plan to minimize the potential for objectionable odors affecting existing and reasonably foreseeable future sensitive receptors. The Odor Reduction Plan shall apply to all odor-generating activities at the facility and shall be implemented for the life of the project. At a minimum, the Odor Reduction Plan shall include the following elements:

- Odor source identification and controls
  The Odor Reduction Plan shall identify all odor-generating sources, and for each source, the Odor Reduction Plan shall specify operational and engineering controls designed to minimize odor generation and release. Odor sources include, but are not limited to:
  - receiving, unloading, and sorting of organics within the organics building enclosure; and
  - pre-processing and mixing of feedstocks.

  Odor sources associated with Phase 2 of the project include, but are not limited to:
  - covered aerated static pile (ASP) composting operations;
  - curing, screening, and product handling; and
  - management of leachate or contact water.
- Receiving and material recovery building requirements
  To address the highest odor potential activities, the Odor Reduction Plan shall require that:
  - reception and sorting of organic waste occur within the building enclosure, with doors closed except during active vehicle ingress and egress;
  - the organics building enclosure be operated to minimize odor emissions, including use of enclosures, ventilation, and odor control measures as applicable (e.g., negative pressure and treatment through a biofilter, scrubber, or equivalent system, if deemed necessary);
  - onsite staging time for unprocessed food organics be limited to a defined maximum duration of time not beyond the time necessary to move to the next stage, with covered or contained storage; and

- putrescible residuals and screened contaminants be stored in covered containers and removed from the site on a regular schedule sufficient to prevent odor buildup.

- Covered aerated static pile operational controls
  The Odor Reduction Plan shall include procedures to maintain aerobic conditions within covered ASP bays, including monitoring and management of aeration, moisture, and pile conditions. Corrective actions shall be identified for upset conditions (e.g., power outages, aeration system failures, excessive moisture, or indications of anaerobic conditions) to promptly reduce odor potential.

- Odor monitoring, complaints, and adaptive management
  The Odor Reduction Plan shall include an odor monitoring and response program consisting of:

  - installation of odor sensors throughout the site, surrounding the compost, collection, sorting, transfer, storage, areas, and any ancillary process location or odor source (e.g., stationary combustion sources, waste water retention or treatment)
  - routine odor patrols during operations and under meteorological conditions conducive to odor transport;
  - a public odor complaint reporting system and complaint log;
  - defined response times for investigating and addressing complaints; and
  - adaptive management triggers (e.g., repeated verified offsite odor events or complaint patterns) that require implementation of additional corrective actions or operational changes. Corrective actions will vary depending upon the trigger but could include, and are not limited to, improved containment, increased treatment capacity, modified operations, and increased monitoring and response.

If monitoring indicates that applicable controls are not met, the City shall implement corrective actions within 7 days and increase monitoring and patrol frequency. The City shall also publish an annual report that summarizes complaints, response times, and measures implemented to address complaints. This report shall be kept on file at the facility and made available to the public/PCAPCD upon request.

Documentation and updates
The Odor Reduction Plan shall be kept on file at the facility, made available to the public/PCAPCD upon request, and updated as necessary to reflect changes in operations, waste streams, control technologies, or regulatory requirements.

Revised:

Mitigation Measure 3.3-5: Implement Facility Odor Reduction Plan

Prior to commencement of operations involving municipal green waste and food organics, the City shall prepare, implement, and maintain a comprehensive Odor Reduction Plan to minimize the potential for objectionable odors affecting existing and reasonably foreseeable future sensitive receptors. The Odor Reduction Plan shall apply to all odor-generating activities at the facility and shall be implemented for the life of the project. At a minimum, the Odor Reduction Plan shall include the following elements:

- Odor source identification and controls
  The Odor Reduction Plan shall identify all odor-generating sources, and for each source, the Odor Reduction Plan shall specify operational and engineering controls designed to minimize odor generation and release. Odor sources include, but are not limited to:

  - receiving, unloading, sorting, handling, and temporary storage of municipal solid waste and organics within the material recovery facility and organics building enclosures;
  - pre-processing and mixing of feedstocks; and
  - management of residual materials and recyclables prior to off-site transport.

Odor sources associated with Phase 2 of the project include, but are not limited to:

- covered aerated static pile (ASP) composting operations;
- curing, screening, and product handling; and
- management of leachate or contact water, including associated contact water retention, reuse, and management facilities.

- Receiving and material recovery building requirements
  To address the highest odor potential activities, the Odor Reduction Plan shall require that:
  - reception and sorting of organic waste occur within the building enclosure, with doors closed except during active vehicle ingress and egress;
  - the organics building enclosure be operated to minimize odor emissions, including use of enclosures, ventilation, and odor control measures as applicable (e.g., negative pressure and treatment through a biofilter, scrubber, or equivalent system, if deemed necessary);
  - onsite staging time for unprocessed food organics be limited to a defined maximum duration of time not beyond the time necessary to move to the next stage, with covered or contained storage; and
  - putrescible residuals and screened contaminants be stored in covered containers and removed from the site on a regular schedule sufficient to prevent odor buildup.
  - housekeeping procedures be identified to minimize odor accumulation within processing and storage areas, including routine cleaning of floors, equipment, conveyors, tipping areas, loading areas, and management of spilled or accumulated waste materials, as appropriate.

- Covered aerated static pile operational controls
  The Odor Reduction Plan shall include procedures to maintain aerobic conditions within covered ASP bays, including monitoring and management of aeration, moisture, pile conditions, and other compost operating parameters relevant to odor generation and control. Corrective actions shall be identified for upset conditions (e.g., power outages, aeration system failures, excessive moisture, or indications of anaerobic conditions) to promptly reduce odor potential. The Odor Reduction Plan shall also identify procedures to prevent and respond to anaerobic conditions, pile smoldering, smoking, prolonged anaerobic conditions, and other operational conditions that could increase odor emissions.

- Odor monitoring, complaints, and adaptive management
  The Odor Reduction Plan shall include an odor monitoring and response program consisting of:
  - installation of odor sensors throughout the site, surrounding the compost, collection, sorting, transfer, storage, areas, and any ancillary process location or odor source (e.g., stationary combustion sources, waste water retention or treatment)
  - routine odor patrols during operations and under meteorological conditions conducive to odor transport;
  - a public odor complaint reporting system and complaint log;
  - defined response times for investigating and addressing complaints; and
  - adaptive management triggers (e.g., repeated verified offsite odor events or complaint patterns) that require implementation of additional corrective actions or operational changes. Corrective actions will vary depending upon the trigger but could include, and are not limited to, improved containment, increased treatment capacity, modified operations, increased monitoring and response, enhanced housekeeping practices, reduced material staging times, additional odor-control measures for composting operations, modifications to compost management practices, or additional engineering controls for odor capture and treatment.

If monitoring indicates that applicable controls are not met, the City shall implement corrective actions as soon as practical and within 7 days and increase monitoring and patrol frequency. The City shall also publish an annual report that summarizes complaints, response times, and measures implemented to address complaints. This report shall be kept on file at the facility and made available to the public/PCAPCD upon request.

Documentation and updates

The Odor Reduction Plan shall be kept on file at the facility, made available to the public/PCAPCD upon request, and updated as necessary to reflect changes in operations, waste streams, control technologies, or regulatory requirements.

3.4 REVISIONS TO SECTION 3.5, "BIOLOGICAL RESOURCES"

In response to comments A3-3 and A3-4, and to provide an update to reflect the current CESA candidate status and potential for occurrence of western burrowing owl, Table 3.5-2 on page 3.5-12 of the Draft EIR is revised as follows:

Original:

Table 3.5-2 Special-Status Wildlife Species Known to Occur in the Vicinity of the Project Site and Potential for Occurrence on the Project Site

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence
Birds				
Burrowing owl *Athene cunicularia*	–	SSC	Open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	Not expected to occur. Although the project site contains earthen berms that may provide burrow habitat suitable for this species, the grass covering the berms is high and dense likely precluding use by this species.

Revised:

Table 3.5-2 Special-Status Wildlife Species Known to Occur in the Vicinity of the Project Site and Potential for Occurrence on the Project Site

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence
Birds				
Burrowing owl *Athene cunicularia*	–	SSC, SC	Open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	Not expected to occur. The project site contains earthen berms that may provide burrow habitat suitable for this species, the grass covering the berms is high and dense likely precluding use by this species. Although new occurrences have been reported in the vicinity of the project site, these observations are outside of the project site in disturbed habitats (i.e., active construction sites).

In response to comments A3-3 and A3-4, and to provide an update to the potential for occurrence of western burrowing owl, a discussion of burrowing owl, following the special-status birds, common raptors, and other

common native birds discussion beginning on page 3.5-31 of the Draft EIR, is added as follows with a new mitigation measure:

Original:

Significance after Mitigation

Implementation of Mitigation Measure 3.5-2h would reduce potential impacts on special-status birds, raptors, and other common native nesting birds to a less-than-significant level by requiring focused surveys for nesting birds, implementation of measures to avoid disturbance, injury, or mortality of the species if nests are detected and compensatory mitigation to offset the loss of Swainson's hawk foraging habitat.

Revised:

Significance after Mitigation

Implementation of Mitigation Measure 3.5-2h would reduce potential impacts on special-status birds, raptors, and other common native nesting birds to a less-than-significant level by requiring focused surveys for nesting birds, implementation of measures to avoid disturbance, injury, or mortality of the species if nests are detected and compensatory mitigation to offset the loss of Swainson's hawk foraging habitat.

Burrowing Owl

Although no habitat suitable for burrowing owl was identified on the project site during 2024 surveys conducted for the project, recent construction projects in the vicinity of the project site have converted rice fields to disturbed upland habitat, suitable for burrowing owl. In 2025, burrowing owls were observed approximately 340 feet south of Phillip Road, south of the project site. Burrowing owl surveys in that off-site area have been ongoing since the 2025 observation, and no burrowing owls have been observed in this area since the first observation (CNDDB 2026). The nearest 2026 burrowing owl observations were approximately 4,200 feet south of Phillip Road, which is outside of CDFW's 500-meter (1,640-foot) recommended survey buffer for western burrowing owls. Western burrowing owls this far from the project site would not be adversely affected by project activities. For these reasons, the project's impacts on burrowing owls would be **less than significant**. Nonetheless, in deference to a request from the California Department of Fish and Wildlife (July 3, 2026 email from Patrick Moeszinger to Jessica Lynch), the City shall implement the following burrowing owl mitigation measures prior to and during project construction. The implementation of these measures would ensure this impact remains less than significant.

Mitigation Measures

Mitigation Measure 3.5-2k: Conduct Preconstruction Surveys for Western Burrowing Owl and Implement Avoidance Measures.

- A qualified biologist shall conduct surveys for burrowing owls in areas of habitat suitable for the species on and within 1,640 feet (500 meters) of the project site. Inaccessible areas (e.g., adjacent private property) will not be surveyed directly if access is not granted, but the biologist may use binoculars or a spotting scope to survey these areas from the project site or other publicly accessible areas. A minimum of four surveys shall be conducted to determine whether burrowing owls occupy habitats on or within 1,640 feet of the project site. Surveys shall be conducted according to Appendix D of the 2012 *Staff Report on Burrowing Owl Mitigation* prepared by the California Department of Fish and Game (now CDFW) (CDFG 2012), or any subsequent updated guidance. If feasible, at least one survey should be conducted between February 15 and April 15 and the remaining surveys should be conducted between April 15 and July 15, at least three weeks apart. Because burrowing owls may recolonize a site after only a few days, one of the surveys, or an additional survey, shall be conducted no less than 14 days before initiating ground disturbance activities to verify that take of burrowing owl would not occur. During the non-breeding season (September 1 to January 31), surveys will document whether burrowing owls are using habitat in or directly adjacent to any area to be disturbed by project activities. Survey results will be valid only for the season (breeding or non-breeding) during which the survey was conducted.

- If no burrowing owls are found, the qualified biologist shall submit a report documenting the survey methods and results to the City, and no further mitigation shall be required.
- If a burrow occupied by a burrowing owl is found during the surveys, the City shall establish and maintain a buffer around the occupied burrow and any identified satellite burrows (i.e., burrows used to escape predators or move young into after hatching) to prevent take of the burrowing owls.
  - During the non-breeding season (September 1 through January 31), the minimum buffer distance shall be 164 feet (50 m). During the breeding season (February 1 through August 31), the minimum buffer distance shall follow CDFW's recommended buffers depending on the level of disturbance.
  - The buffer may be adjusted if, in consultation with CDFW, a qualified biologist determines that an alternative buffer would not result in take of burrowing owl adults, young, or eggs because of particular site features (e.g., topography, natural line-of-sight barriers), level of project disturbance, or other considerations. If the buffer is reduced, a qualified biologist shall monitor the behavior of the burrowing owls during all project activities within 1,640 feet of the burrow. If the owls are disturbed or agitated (e.g., vocalizations, bill snaps, fluffing feathers to increase body size appearance, drooping wings and rotating them forward, crouching and weaving back and forth) by the project activities, the biologist shall have the authority to halt the activities and re-establish a buffer consistent with the first bullet until the agitated behavior ceases and normal behavior resumes.
  - The buffer shall remain in place around the occupied burrow and associated satellite burrows until a qualified biologist has determined through noninvasive methods that the burrows are no longer occupied by burrowing owl. A previously occupied burrow will be considered unoccupied if surveys demonstrate that no owls have used the burrow for seven consecutive days.
  - Locations of burrowing owls detected during surveys shall be reported to the CNDDB.
- If implementation of a buffer to prevent take of burrowing owl is not feasible, the City shall consult with CDFW and obtain an Incidental Take Permit (ITP) prior to commencing project related ground-disturbing activities. The impacts of taking burrowing owl shall be minimized and fully mitigated.
- If take occurs, the City shall compensate for the loss of burrowing owl by establishing permanent protection and perpetual management on land that provides burrowing owl habitat. Habitat management lands for burrowing owl may be established by conservation easement or fee title, or credits may be purchased from a CDFW-approved conservation or mitigation bank. The compensatory mitigation shall satisfy permit conditions and all other permit conditions shall be implemented.
- The City shall decommission the rice fields and other active agricultural areas on the project site only after these areas have been surveyed for burrowing owls as indicated above. Decommissioning of rice fields and other agricultural areas shall include the removal of all irrigation and drainage components, including pipe culvert, rice trunks/sluice boxes, and any other debris from the area.
- All demolition debris shall be removed from the site to prevent wildlife from using the debris as shelter. Demolition debris may be stored in covered containers immediately prior to off-site transport.
- Laydown materials areas shall be maintained and monitored so that materials and equipment do not attract or provide shelter habitat for wildlife. Pipes or other construction materials that could provide burrow surrogate habitat shall be kept covered or sealed.

Significance after Mitigation

Implementation of Mitigation Measure 3.5-2k would ensure potential impacts on burrowing owls remain **less-than-significant** by requiring that active burrows on or near the project site be identified and avoided or monitored so that project construction would not result in nest abandonment and loss of eggs or young.

In response to comments A3-3 and A3-4, and to provide an update to the potential for occurrence of western burrowing owl, the discussion of mitigation measures for Phase 2 on page 3.5-36 of the Draft EIR, is revised as follows to identify the new Mitigation Measure 3.5-2k:

Original:

Mitigation Measures

Implement Mitigation Measures 3.5-2a, 3.5-2b, 3.5-2c, 3.5-2f, 3.5-2g, 3.5-2h, 3.5-2i, and 3.5-2j, described above.

Significance after Mitigation

Implementation of Mitigation Measures 3.5-2a, 3.5-2b, and 3.5-2c would reduce potential impacts on northwestern pond turtle to a less-than-significant level by requiring focused surveys for the species, implementation of measures to avoid injury or mortality of northwestern pond turtles if detected, and relocation of individual turtles by a qualified biologist with an appropriate CDFW Scientific Collecting Permit, implementing construction BMPs and providing stream setback by fencing or flagging the limits of disturbance, developing a nuisance wildlife management plan and incorporating it into the City's Environmental Utilities Facility Management Plan.

Implementation of Mitigation Measures 3.5-2f would reduce the potential impact on Crotch's bumble bee to a less-than-significant level by requiring focused surveys for bumble bees and implementation of measures to avoid mortality of the Crotch's bumble bees if nests or overwintering queens are detected.

Implementation of Mitigation Measure 3.5-2g would reduce potential impacts on monarch to a less-than-significant level by requiring focused surveys for milkweed plant, monarch eggs, larvae, and pupae and implementation of measures to avoid mortality of monarch eggs, larvae, and pupae if they are detected.

Implementation of Mitigation Measure 3.5-2h would reduce potential impacts on special-status birds, raptors, and other common native nesting birds to a less-than-significant level by requiring focused surveys for nesting birds, implementation of measures to avoid disturbance, injury, or mortality of the species if nests are detected and compensate for the loss of Swainson's hawk foraging habitat.

Implementation of Mitigation Measure 3.5-2i would reduce potential impacts on Northern California ringtail to a less-than-significant level by requiring focused surveys for ringtail dens prior to removing trees or demolishing or repurposing unoccupied buildings at the site and implementing no-disturbance buffers around active dens in consultation with CDFW.

Implementation of Mitigation Measure 3.5-2j would reduce potential impacts on pallid bat and western red bat to a less-than-significant level by requiring focused surveys for bat roosts, implementation of no-disturbance buffers around active special-status bat roosts, and consultation with CDFW if special-status bat roosts would be removed.

For the above reasons, implementation of Mitigation Measures 3.5-2a, 3.5-2b, 3.5-2c, 3.5-2f, 3.5-2g, 3.5-2h, 3.5-2i, and 3.5-2j would reduce impacts to special-status wildlife species to a **less-than-significant** level.

Revised:

Mitigation Measures

Implement Mitigation Measures 3.5-2a, 3.5-2b, 3.5-2c, 3.5-2f, 3.5-2g, 3.5-2h, 3.5-2i, 3.5-2j, and 3.5-2k, described above.

Significance after Mitigation

Implementation of Mitigation Measures 3.5-2a, 3.5-2b, and 3.5-2c would reduce potential impacts on northwestern pond turtle to a less-than-significant level by requiring focused surveys for the species, implementation of measures to avoid injury or mortality of northwestern pond turtles if detected, and relocation of individual turtles by a qualified biologist with an appropriate CDFW Scientific Collecting Permit,

implementing construction BMPs and providing stream setback by fencing or flagging the limits of disturbance, developing a nuisance wildlife management plan and incorporating it into the City's Environmental Utilities Facility Management Plan.

Implementation of Mitigation Measures 3.5-2f would reduce the potential impact on Crotch's bumble bee to a less-than-significant level by requiring focused surveys for bumble bees and implementation of measures to avoid mortality of the Crotch's bumble bees if nests or overwintering queens are detected.

Implementation of Mitigation Measure 3.5-2g would reduce potential impacts on monarch to a less-than-significant level by requiring focused surveys for milkweed plant, monarch eggs, larvae, and pupae and implementation of measures to avoid mortality of monarch eggs, larvae, and pupae if they are detected.

Implementation of Mitigation Measure 3.5-2h would reduce potential impacts on special-status birds, raptors, and other common native nesting birds to a less-than-significant level by requiring focused surveys for nesting birds, implementation of measures to avoid disturbance, injury, or mortality of the species if nests are detected and compensate for the loss of Swainson's hawk foraging habitat.

Implementation of Mitigation Measure 3.5-2i would reduce potential impacts on Northern California ringtail to a less-than-significant level by requiring focused surveys for ringtail dens prior to removing trees or demolishing or repurposing unoccupied buildings at the site and implementing no-disturbance buffers around active dens in consultation with CDFW.

Implementation of Mitigation Measure 3.5-2j would reduce potential impacts on pallid bat and western red bat to a less-than-significant level by requiring focused surveys for bat roosts, implementation of no-disturbance buffers around active special-status bat roosts, and consultation with CDFW if special-status bat roosts would be removed.

Implementation of Mitigation Measure 3.5-2k would ensure potential impacts on burrowing owls remain less-than-significant by requiring that active burrows on or near the project site be identified and avoided or monitored so that project construction would not result in nest abandonment and loss of eggs or young.

For the above reasons, implementation of Mitigation Measures 3.5-2a, 3.5-2b, 3.5-2c, 3.5-2f, 3.5-2g, 3.5-2h, 3.5-2i, 3.5-2j, and 3.5-2k would reduce impacts to special-status wildlife species to a **less-than-significant** level.

In response to comments on the Draft EIR from the California Department of Fish and Wildlife (CDFW) and the Placer Conservation Authority (PCA), and to provide an update to the project's potential to result in indirect effects on off-site wetlands, the analysis of Impact 3.5-4 on page 3.5-38 of the Draft EIR, is revised as follows:

Original:

Impact 3.5-4: Result in Degradation or Loss of State or Federally Protected Wetlands

Phase 1

Implementation of Phase 1 would include ground disturbance, vegetation removal, and direct removal of riparian habitat adjacent to wetlands previously identified in the off-site portion of the PUE, which could result in inadvertent fill of the identified wetlands. Fill of wetlands would remove or degrade these features, which would be a **potentially significant** impact.

No state or federally protected wetlands or other waters of the United States or waters of the state are located within the proposed development area of the project site and, thus, the project would not result in any direct impacts to wetlands or other waters on the project site. Potential indirect effects from sedimentation or runoff from construction and operation of the project are addressed in Section 3.11, "Hydrology and Water Quality."

Wetlands with vegetation assemblages associated with vernal pools have been previously identified in the off-site portion of the PUE. Ground disturbance, vegetation removal, and direct removal of riparian habitat adjacent to wetlands previously identified in the off-site portion of the PUE could result in inadvertent fill of the identified wetlands. Fill of wetlands would remove or degrade these features, which would be a **potentially significant** impact.

Revised:

Impact 3.5-4: Result in Degradation or Loss of State or Federally Protected Wetlands

Phase 1

Implementation of Phase 1 would include ground disturbance, vegetation removal, and direct removal of riparian habitat adjacent to wetlands previously identified in the off-site portion of the PUE, which could result in inadvertent fill of the identified wetlands. Fill of wetlands would remove or degrade these features, which would be a **potentially significant** impact. In addition, wetlands located on nearby Placer Conservation Authority reserve properties could be indirectly affected if project implementation would result in a substantial change to off-site hydrologic conditions. Such changes could adversely affect wetland functions and values, resulting in a **potentially significant** impact.

No state or federally protected wetlands or other waters of the United States or waters of the state are located within the proposed development area of the project site and, thus, the project would not result in any direct impacts to wetlands or other waters on the project site. Potential indirect effects from sedimentation or runoff from construction and operation of the project are addressed in Section 3.11, "Hydrology and Water Quality."

Wetlands with vegetation assemblages associated with vernal pools have been previously identified in the off-site portion of the PUE. Ground disturbance, vegetation removal, and direct removal of riparian habitat adjacent to wetlands previously identified in the off-site portion of the PUE could result in inadvertent fill of the identified wetlands. Fill of wetlands would remove or degrade these features, which would be a **potentially significant** impact. In addition, wetlands located on nearby Placer Conservation Authority reserve properties could be indirectly affected if project implementation would result in a substantial change to off-site hydrologic conditions. Such changes could adversely affect these wetlands and would be a **potentially significant** impact.

In response to comments on the Draft EIR from CDFW and PCA, and to provide an update to the project's potential to result in indirect effects on off-site wetlands, a new bullet is added to the end of Mitigation Measure 3.5-4b on page 3.5-39 of the Draft EIR, as follows:

Revised:

Mitigation Measure 3.5-4b: Identify State or Federally Protected Wetlands, Implement Avoidance Measures, and Obtain Permits for Unavoidable Impacts on Wetlands

- The City shall prepare a hydrologic study to characterize existing site hydrology and ensure that project implementation and operation would not result in a substantial change to off-site hydrologic conditions within 250 feet from the project's disturbance boundary. Based on the study findings, the City shall establish and implement appropriate buffers, as warranted, to avoid substantial adverse effects on off-site seasonal wetlands.

In response to comments on the Draft EIR from CDFW and PCA, and to expand Mitigation Measure 3.5-5 to also apply to the nearby Placer Conservation Authority reserve properties, Mitigation Measure 3.5-5 on page 3.5-42 of the Draft EIR, is revised as follows:

Original:

Mitigation Measure 3.5-5: Utilize Wildlife-Friendly Building Design

In addition to Mitigation Measure 3.1-3, described in Section 3.1, "Aesthetics and Visual Resources," the City shall implement the following measures:

- Buildings and other permanent structures shall be designed to minimize impacts on wildlife, including disruption to wildlife movement.
    - Building design shall utilize guidelines regarding building height, materials, external lighting, and landscaping provided in the American Bird Conservancy's "Bird Friendly Building Design" (American Bird Conservancy 2015).
- The City shall place structural barriers to screen construction lighting and construction vehicular headlights that are directed perpendicular to Pleasant Grove Creek. This may be accomplished through the placement of a 5-6-foot vegetated hedge or other structural method that would screen the northern portion of the project.
- To minimize light spillage from the project during operation into Pleasant Grove Creek, outdoor lighting shall be the minimum wattage required for the particular use, shall be shielded, and shall be directed to the specific location intended for illumination to prevent stray light spillover onto sensitive riparian habitat.

Revised:

Mitigation Measure 3.5-5: Utilize Wildlife-Friendly Building Design

In addition to Mitigation Measure 3.1-3, described in Section 3.1, "Aesthetics and Visual Resources," the City shall implement the following measures:

- Buildings and other permanent structures shall be designed to minimize impacts on wildlife, including disruption to wildlife movement.
    - Building design shall utilize guidelines regarding building height, materials, external lighting, and landscaping provided in the American Bird Conservancy's "Bird Friendly Building Design" (American Bird Conservancy 2015).
- The City shall place structural barriers to screen construction lighting and construction vehicular headlights that are directed perpendicular to Pleasant Grove Creek. This may be accomplished through the placement of a 5-6-foot vegetated hedge or other structural method that would screen the northern portion of the project. The City shall also implement measures to minimize spillover of construction lighting onto nearby Placer Conservation Authority reserve properties, including the use of shielded fixtures, directional lighting, and other lighting controls as necessary.
- To minimize light spillage from the project during operation into Pleasant Grove Creek and the nearby Placer Conservation Authority reserve properties, outdoor lighting shall be the minimum wattage required for the particular use, shall be shielded, and shall be directed to the specific location intended for illumination to prevent stray light spillover onto sensitive riparian habitat.

To provide an update that reflects the results of tree surveys conducted in May 2026 for the project, the analysis of Impact 3.5-6 on page 3.5-43 is revised as follows:

Original:

Impact 3.5-6: Conflict with Local Policies and Ordinances

Phase 1

Chapter 19.66 of the City of Roseville Municipal Code, "Tree Preservation," contains requirements for projects that would remove protected trees. Implementation of the project would result in direct removal of or damage to trees that may be protected under the City of Roseville Municipal Code. This impact would be **potentially significant.**

Implementation of Phase 1 would require the removal of trees present within the proposed development area of the project site that may qualify as protected trees (see the discussion of the City of Roseville Municipal Code in Section 3.5.1, "Regulatory Setting"). As defined by the City of Roseville Municipal Code (Chapter 19.66, Tree Preservation), native oak trees greater than 6 inches diameter at breast height are protected. A Tree Permit would be required for the removal of any protected tree, and for any regulated activity within the protected zone of a protected tree where the encroachment exceeds 20 percent. A survey of the trees on the project site has not been completed; therefore, trees planned for removal as part of project implementation may meet the definition of protected trees pursuant to the City of Roseville Municipal Code. This would be a **potentially significant** impact.

Revised:

Impact 3.5-6: Conflict with Local Policies and Ordinances

Phase 1

Chapter 19.66 of the City of Roseville Municipal Code, "Tree Preservation," contains requirements for projects that would remove protected trees. Implementation of the project would result in direct removal of or damage to trees that may be protected under the City of Roseville Municipal Code. This impact would be **potentially significant.**

Implementation of Phase 1 would require the removal of trees present within the proposed development area of the project site that may qualify as protected trees (see the discussion of the City of Roseville Municipal Code in Section 3.5.1, "Regulatory Setting"). As defined by the City of Roseville Municipal Code (Chapter 19.66, Tree Preservation), native oak trees greater than 6 inches diameter at breast height are protected. A Tree Permit would be required for the removal of any protected tree, and for any regulated activity within the protected zone of a protected tree where the encroachment exceeds 20 percent. Tree surveys were conducted in May 2026 to document existing tree resources within and adjacent to the project study area, evaluate tree condition and structural characteristics, identify trees that may qualify for protection under applicable City regulations, and provide planning-level information regarding potential tree constraints and opportunities for preservation (Helix Environmental Planning 2026). Based on the survey results, project implementation could require the removal of trees that qualify as protected trees pursuant to the City of Roseville Municipal Code. As project design advances, the City would seek opportunities to avoid and minimize the removal of existing trees through site planning and design refinements where practicable, with priority given to the preservation of mature native oak trees. Nonetheless, project implementation could result in the removal of or damage to trees protected under the City of Roseville Municipal Code. Therefore, this would be a **potentially significant** impact.

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4 REFERENCES

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No references were cited in this chapter.

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California Department of Fish and Game. 2012 (March 7). *Staff Report on Burrowing Owl Mitigation*. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline=true. Accessed August 4, 2026.

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CNDDB. *See* California Natural Diversity Database.

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Appendix A

Placer County Conservation Program:
Development Interface Design Requirements

PLACER COUNTY CONSERVATION PROGRAM

WESTERN PLACER COUNTY HABITAT CONSERVATION PLAN/ NATURAL COMMUNITY CONSERVATION PLAN

February 2020

condition is to provide additional measures to minimize effects on Covered Species and natural communities in reserves from neighboring urban and rural development.

6.3.1.2.1 Conservation Lands: Development Interface Design Requirements

Beyond minimizing direct and indirect effects, the design of new development occurring adjacent to conservation lands will consider indirect and long-term effects, such as runoff from developed areas, which can transport harmful substances (e.g., pesticides, fertilizer, automotive fluids, sediment) into conservation lands; changes to hydrological conditions; the establishment of invasive non-native species, which can disperse from landscaped areas; and potential structural and biological damage (e.g., soil compaction, creation of unauthorized trails, disturbance of sensitive species) that can result from unmanaged human access and use. Application of the following design requirements will help minimize the potential for indirect effects of development on conservation lands.

1. Signage will be posted to notify of any usage restrictions and to educate the public on the sensitivity of the area and usage restrictions.
2. Fencing will be installed at the boundary between developed areas and reserves to prevent illegal access by people and pets, unless the conditions on the reserve make trespass unlikely (i.e., surrounded by canals that are difficult to cross). Fences will be suitable to the conditions in the adjacent reserve. The type of fence required will be at the discretion of the County or City, as permitted by County and City codes. Fences will have limited gates and be designed with consideration to not allowing movement of people and their pets. Access will be limited to maintenance and monitoring activities unless a habitat management plan specifies otherwise.
3. Natural or artificial barriers or other access restrictions may be installed around development to protect sensitive land-cover types and Covered Species in the reserves. If used, barriers will be designed so they are appropriate for site conditions and the resources being protected. Some barriers should keep domestic pets outside the reserve, other barriers should keep Covered Species inside the reserve. Before installation of a barrier, consideration shall be given to freedom of movement by Covered Species. If the barrier would prevent movement, or if the barrier would encourage species to use other, less-favorable crossings, alternative solutions shall be considered.
4. Roads constructed adjacent to reserves will be fenced to restrict unauthorized public access. Through the conditional approval process, the Permittee will only approve fencing that is appropriate (e.g., chain link, post and cable, barbwire) to allow movement of wildlife between reserves.
5. Development will be designed to minimize the length of the shared boundary between development and the reserves (i.e., minimize the urban edge, perimeter).
6. Incorporation of high-intensity lighting (e.g., floodlights used for recreational facilities and commercial parking lots) into site improvement standards near reserves will be avoided. Low-glare, no-glare, or shielded lighting will be installed in developed areas adjacent to reserves to minimize artificial lighting of reserve lands at night. The height and intensity of lights shall be kept to a minimum. Resources providing technical support include publications of the Illuminating Engineering Society of North America and its *Lighting Handbook, Reference & Application, Ninth Edition, and Recommended Practices*. The intent of this avoidance and minimization measure is to design a lighting system, where determined necessary, that maintains public safety and security in the project area while curtailing the degradation of the

nighttime visual environment on the reserve property by limiting nighttime light radiation and/or light spill.

7. Public facilities, such as ballparks and fields that require high-intensity night lighting (i.e., floodlights), will be sited at least 0.5 mile from the reserve boundary to minimize light pollution. Facilities may be sited closer to the Reserve System if the PCA determines the lighting system will not be intrusive to wildlife within the Reserve System (e.g., hills block the lighting).
8. For any landscaping adjacent to reserve properties, non-invasive plants will be required, and the use of native plants will be highly encouraged, consistent with County landscape design guidelines (Placer County 2013) or similar standards for the City of Lincoln.

Any of the above design requirements, or similar requirements developed over time, that are incorporated into projects will be located within the development footprint. These project features will be maintained by the property owners. Conditions of approval on projects are monitored by County or City staff during the construction and development phase and are enforced over time through the efforts of professional land development staff familiar with the project or a code enforcement division. If projects are found to be out of compliance, standard remedial actions would be applied and may include: code enforcement, use of securities, revocation or modification of entitlement. Violations will be reported to the PCA, Wildlife Agencies, and applicable local jurisdiction for potential enforcement.

The above avoidance and minimization measures are intended to serve as guidelines that establish, at a minimum, how effects at the development interface with the Reserve System and other conservation lands can be avoided and minimized. Site conditions may introduce additional opportunities that will need to be considered on a case-by-case basis (e.g., topographic conditions, location of passive recreational facilities, native landscaping buffers).

Non-participating local jurisdictions are encouraged to consult with the PCA during the development review process for large projects planned at the boundary of existing reserves.

6.3.1.3 General Condition 3, Land Conversion

Covered Activities that would result in permanent conversion of natural land cover must pay fees or otherwise contribute to establishing the Reserve System and are subject to the maximum extent of take proposed under the Plan.

Land conversion refers broadly to an activity or process that results in the permanent conversion of a natural or semi-natural land cover to an urban, suburban, rural residential, or other artificial, built-up, or otherwise non-natural condition. It is not meant to apply when one natural or semi-natural land-cover type is converted to another natural or semi-natural land-cover type. It is also not meant to apply to changes in agricultural crop types, which is not a Covered Activity addressed by the Plan. Application of this condition is a key provision of the Plan. Land conversion allowable under the permits will be subject to an overall maximum extent of take. The proposed extent of take sets a maximum acreage of cumulative land conversion from all Covered Activities. Proposed maximums are set for several communities and are listed in Table 4-1 for permanent effects. Proposed maximums are also set for geographical Plan subareas, with some provision for flexibility in shifting allowable take between subareas.

The conservation strategy outlined in Chapter 5, *Conservation Strategy*, serves at a regional scale as conservation in perpetuity for Covered Species and mitigation for the effects of Covered Activities.

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