

MEMORANDUM

To: Planning Commission

From: Kinarik Shallow, Assistant Planner

Date: May 3, 2019

Re: INFILL PCL 246 – Roseville Old Town Lofts (File #PL18-0178) – Response to Public Comments

The purpose of this memorandum is to address written comments received on the Roseville Old Town Lofts project. A total of 11 letters were received, either by mail or e-mail. The memorandum is separated into two parts: Part I addresses written comments received on the adequacy of the Initial Study/Mitigated Negative Declaration (IS/MND); Part II addresses written comments received pertaining to the overall project. Attached to this memorandum are all comments received, as of memorandum publication.

Part I: Response to IS/MND Comments

Of the 11 letters received, six (6) letters included comments and questions applicable to the IS/MND prepared for the project (see Attachments 1-6). Responses to the letters are included below, in the order the letters were received.

Attachment #1 – Comments from Michael Ryan

Based on Mr. Ryan's comments and questions, it appears there is confusion as to who prepared the IS/MND. The City of Roseville, acting as Lead Agency, prepared the IS/MND. This is identified in the public notice of the document, as well as within the document itself. The comments provided by Mr. Ryan that relate to CEQA are addressed below.

1. Construction Activities

- a. *While my family does not work at night and sleep during the day, reading the report, it does not say if they have walked around and asked if this applies to certain homes/families. It states that only ambient construction noise at 60 db will be spread and the box checked "less than significant". Having worked on MANY outside jobs that are relative to this size, this statement is blatantly not truthful. 60 db is about the sound a lawnmower makes. With the amount of work that is needed on this job, it will be much higher than this. I have a link below that shows a diesel truck to be about 100 db. <https://www.pavementinteractive.org/reference-desk/pavement-management/impacts/construction-noise/> Whoever created this report, can they describe the means and methods they used to get the number of 60 db?*
- i. The 60 dB referenced in the IS document does not represent the construction noise level of the project. Rather, the IS discusses that the project is located within the 60 dB Ldn noise contour for both existing roadways and future roadways, as identified in the Noise Element of the City's General Plan. Per Section 9.24.030(G) of the City's Noise Ordinance, private construction activities are exempt from the Noise Ordinance when conducted between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday, and between the hours of 8:00 a.m. and 8:00 p.m. Saturday and Sunday; provided, however, that all construction equipment shall be fitted with factory installed muffling devices and that all construction equipment shall be maintained in good working order.

- b. *The report gives a brief timeline of completion, however there is no mention if they have included delays due to weather. The construction period 9/1/19 - 2/20/19 are during the wettest months of the year. Have they considered this? Reading the report they do not make a statement of this.*
- i. The construction timeline was included as part of the CalEEMod modeling calculations (Attachment 3 of the IS/MND). As stated in the calculations, this construction period is an estimate for purposes of calculating potential construction emissions and is not an exact construction timeline.

2. Building Construction Materials/Methods

- a. *CA just passed a law that all new homes must have solar cells at the time of construction. The photos do not show a reflected roofing plan, however it does not appear in the report to reflect the installation of these green or LEED items, with the construction finishing in 2020, how does the law effect this new construction? Is there an exception to this rule because of the high density nature of these buildings?*
- i. The project was routed for review to the City's Building Division. A condition of approval was added to the project requiring compliance with all applicable code requirements, including the California Green Building Standards Code—CGBSC, at the time of building permit submittal.
- b. *The report has no direction of if the building will be constructed with green energy efficient materials. Is there a reason why this isn't implemented into the report?*
- i. Section VI (Energy), checklist items a and b discuss that, in accordance with California Energy Code Title 24, the project would be required to meet the Building Energy Efficiency Standards. This includes standards for water and space heating and cooling equipment; insulation for doors, pipes, walls, and ceilings; and appliances, to name a few. The project would also be eligible for rebates and other financial incentives from both the electric and gas providers for the purchase of energy-efficient appliances and systems, which would further reduce the operational energy demand of the project.
- c. *Noise does travel more at night, and with little line of sight obscuration (trees/other buildings) the noise traveling from late night parties at the roof tops will travel. I do not see a study on the noise traveling at night from that height and how it may effect the neighboring houses. There should be one done and given to the neighboring residents for review.*
- i. Per the General Plan, residential uses generate low outdoor noise volumes. The proposed buildings will have a 5-foot tall roof parapet that will help screen the rooftop patios and buffer noise. The project is subject to the City's Noise Regulation (RMC Chapter 9.24), which includes sound limits for sensitive receptors (i.e., residential uses).
- d. *Part I gives an aesthetics review. The checklist gives a "no impact" to the question "Have a substantial adverse effect on a scenic vista". This neighborhood may not be classified as a "Scenic Vista" however it has some of the oldest homes in the area, and they are historic in nature. It seems that this question was selectively left off of the report to show a favorable rating in this aspect. Is this finding acceptable to the city with the historic nature of this neighborhood?*
- i. Mr. Ryan is referencing checklist item "a" of Section I (Aesthetics), which asks whether the project would have a substantial adverse effect on a scenic vista. As identified in the IS, there are no designated or eligible scenic vistas or scenic highways within or adjacent to the City of Roseville, which is why "no impact" was selected. Additionally, the City's Zoning Ordinance includes a list of "significant buildings" that are defined as having special historic, cultural or aesthetic interest, and which have been listed in Section 19.61.030(A) of the Zoning Ordinance. The list does not include the address of the project site, or any buildings located on Douglas Boulevard or Nevada Avenue.

3. Impact to Nearby Schools

- a. *The report notes that there will be "no impact" to the nearby schools if approved. Some simple math shows that 2 children per household = 56 new children at public schools which is approximately 2 whole classrooms k-12. Has the city prepared financially for the increase of children in the classroom at nearby schools for the various grade level increases?*
 - i. As identified in Section XV (Public Services), checklist item c, the applicant for this project is required to pay school impact fees at a rate determined by the local school districts. School fees will be collected prior to the issuance of building permits, consistent with City requirements. Existing codes, regulations, funding agreements, and facilities plans are sufficient to ensure impacts are less than significant. The project was routed for review to the applicable school districts, which includes the Roseville City School District and the Roseville Joint Union High School District; no comments were received.
 - ii. In addition, the student generation factor for HDR land uses in the Roseville City School District is 0.073 per unit for Grades K-5 and 0.028 per unit for Grades 6-8. The student generation factor for HDR land uses in the Roseville Joint Union High School District is 0.067 per unit. Based on this, the proposed 23 units would generate a total of five (5) new students—two (2) elementary school students (K-5), one (1) middle school student (6-8), and two (2) high school students (9-12).

Attachment #2 – Comments from John J Spalding

Mr. Spalding raises concerns regarding two checklist items on the Initial Study, included below.

1. Section XI (Land Use and Planning), item a): Would the project physically divide an established community?
 - a. The Initial Study (IS) determined the project has no impact on physically dividing an established community. Mr. Spalding makes the comment that, *the proposed 23 units does not conform to the existing landscape of the neighborhood it surrounds which are the small single type family homes*. However, this comment is unrelated to whether the project physically divides an established community. As described in the IS, the project area has been planned for development, includes adequate roads, pedestrian paths, and bicycle paths to provide connections within the community. The project does not create physical barriers to pedestrian or vehicular movement.
2. Section XVII (Transportation), item b): Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 (b) – VMT?
 - a. Mr. Spalding makes a comment that the proposed parking for the project is not adequate for the number of units. However, this comment is unrelated to CEQA Guidelines Section 15064.3. This guideline directs transportation system analysis to focus on vehicle miles traveled (VMT) and indicates that generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. The project site is located within one-half mile of two bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. These transit stops are located at Douglas Boulevard and S. Lincoln Street, and at Douglas Boulevard and Donner Avenue. The project site is also located in close proximity to bikeways and sidewalks, which would encourage alternative modes of transportation. The IS concluded impacts related to this checklist item are less than significant.
 - b. *Does the large master traffic study that was completed a few years back for all of Roseville conflict with the stated project's traffic study?* The City's Engineering Division evaluated the project and determined a traffic study was not required. This determination was based on the

ITE trip generation estimate prepared for the project, which estimates the project will add a total of 12 new pm peak-hour trips to the existing conditions. Consistent with the City's General Plan policy and the City's Design and Construction Standards, a traffic study is not required for projects that do not generate more than 50 pm peak-hour trips than had been anticipated in the traffic model. As such, it can be concluded that the anticipated volume is consistent with the design and capacity of the roadway.

Attachment #3 – Comments from Jeff Dodge

The comments provided by Mr. Dodge that pertain to CEQA are related to Section I (Aesthetics) of the checklist.

1. *Aesthetically, it seems inappropriate to remove one's vista by placing such a tall structure so nearby. In the very same area there are code issues with regard to erecting anything above a certain height for the very reason that it steals the aesthetic beauty one can normally experience in an older neighborhood such as this. Newer developments are a different story, of which there are many areas more suitable in West Roseville, for example.*
 - a. The overall height of the proposed buildings is approximately 44 feet. This is consistent with the R3 development standards, which allows for a maximum building height of 45 feet. The project was determined to have no impact on checklist item a, which asks whether the project has a substantial adverse effect on a scenic vista. This determination was based on the fact that there are no designated or eligible scenic vistas or scenic highways within or adjacent to the City of Roseville. In addition, the project site is located in an urban setting. The project will include a mix of landscaping throughout the site that will help buffer and soften views of the buildings.

Attachment #4 – Comments from Werner Kuehn

1. *In Land Use and Planning Sec XI, Zoning change is proposed from BP (Business Professional) to R3 (High Density) is discussed. In Population and Housing City's, Sec XIV it states "These additional residential units were not contemplated in the City's General Plan. The City has additional infrastructure accommodate the increase. Project will not result in additional infrastructure." I can't imagine ANY place on Douglas that would be suitable. This location is one of the LEAST suitable locations.*
 - a. The project was distributed to all internal and external agencies and departments who requested such notice, including the City's Engineering Division, Environmental Utilities Department, and Roseville Electric. It was concluded that adequate infrastructure exists to accommodate the proposed project.
2. *In Energy Sec. VI, it states that "Its proximity to many resources, it will have lower than average vehicle trips". This is NOT a valid statement. The residents will use their vehicles to visit businesses and will not walk.*
 - c. The project is designed to encourage and promote pedestrian mobility. For example, the units adjacent to Douglas Boulevard will face the roadway and will have paved walkways extending from the front door to the sidewalk along the street. The project site is located within one-half mile of two bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. These transit stops are located at Douglas Boulevard and S. Lincoln Street, and at Douglas Boulevard and Donner Avenue. The project site is also located in close proximity to bikeways and sidewalks, which would encourage alternative modes of transportation. As a result of all these factors, this project will result in lower than average vehicle trips and vehicle miles traveled.
3. *In Biological Resources Sec. IV, I understand 19 Oak trees will be removed to accommodate space for the buildings. Could the number of units be reduced, and trees left in place?*
 - a. The tree inventory provided in the Arborist Report identifies 19 protected Oak trees either located on or overhanging onto the property. Of these trees, 12 are proposed for removal.

Given the proposed density and needs for access, parking, and circulation, there was not a viable alternative identified. The project will mitigate for these trees through a combination of on-site planting of non-native trees and payment into the City's in-lieu fee program.

4. *In Hydrology and Water Quality Sec X it states that there will be no impact. Having lived in the neighborhood for 30 years, I have seen frequent flooding from storm drains on this low section of Douglas Blvd. I understand that currently there is a major storm drain project underway across Douglas in the Hillcrest Neighborhood. I feel that there would be a need for the same infrastructure investment by City (Storm drains, waste water, fresh water) in this area on Nevada Ave.*
 - a. Currently, the northern half of the project site drains to the north and is collected by an existing Drain Inlet (DI). The project will grade the site to ensure that all storm water is collected on site and transferred south to the existing storm drain system in Douglas Blvd. Storm water quality measures, such as infiltration trenches, will be utilized to ensure that post develop flows are not increased from predevelopment flows for most storm events. Both existing and proposed storm drain systems are not designed to handle larger storm events, greater than a 10-year event. The flow from these larger storm events will continue to flow overland and release onto existing local roadways.

5. *In Transportation Sec XVII, it states that there will be no transportation impact. The design of ingress and egress into project from Douglas is a MAJOR traffic hazard, and the City would encounter great liability. A possible solution would be a new traffic light at Nevada and Douglas. If this was designed into the project, it would represent significant cost for the City.*
 - a. The suggestion of installing a new traffic light was considered, however it was determined this would not be feasible due to the proximity to the existing traffic signal on Keehner Avenue. The proposed ingress only driveway on Douglas Blvd. was designed to ensure that the majority of vehicles entering the site do so from Douglas Blvd. This proposed driveway will drastically limit the number of additional trips created by this project that will impact existing neighborhood streets, including Nevada Ave. Due to the low volume of vehicles that will be accessing the proposed project and the low volume of vehicles egressing Nevada Avenue, staff anticipates only nominal increases in delay times egressing Nevada Avenue. In addition, sight distance to the east will be greatly improved with the removal of the existing structure and landscaping currently on the site.

Attachment #5 – Comments from Ron McCary

1. Section X (Hydrology and Water Quality) & Section XIX (Utilities and Service Systems)
 - a. Mr. McCary asks whether adequate capacity exists for stormwater drainage. Currently, the northern half of the project site drains to the north and is collected by an existing Drain Inlet (DI). The project will grade the site to ensure that all storm water is collected on site and transferred south to the existing storm drain system in Douglas Blvd. Storm water quality measures, such as infiltration trenches, will be utilized to ensure that post develop flows are not increased from predevelopment flows for most storm events. Both existing and proposed storm drain systems are not designed to handle larger storm events, greater than a 10-year event. The flow from these larger storm events will continue to flow overland and release onto existing local roadways.

2. Section XVII (Transportation)
 - a. Mr. McCary's comments relating to transportation focus on VMT and the project's impacts on traffic. Pursuant to CEQA Guidelines Section 15064.3(b)(3), "if existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc." Further, CEQA Guidelines Section 15064.3(b)(1) indicates that

“Generally, projects within one-half mile of either a major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant traffic impact. The project is expected to be consistent with the intent of implementing the VMT metric due to the proximity to existing transit stops. For example, the site is located within one-half mile of two bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. These transit stops are located at Douglas Boulevard and S. Lincoln Street, and at Douglas Boulevard and Donner Avenue. The project site is also located in close proximity to bikeways and sidewalks, which would encourage alternative modes of transportation. Because of these factors, the project is not in conflict or inconsistent with CEQA Guidelines Section 15064.3(b).

The City’s Engineering Division evaluated the project and determined a traffic study was not required. This determination was based on the ITE trip generation estimate prepared for the project, which estimates the project will add a total of 12 new pm peak-hour trips to the existing conditions. Consistent with the City’s General Plan policy and the City’s Design and Construction Standards, a traffic study is not required for projects that do not generate more than 50 pm peak-hour trips than had been anticipated in the traffic model. As such, it can be concluded that the anticipated volume is consistent with the design and capacity of the roadway. Further discussion is provided in Part II of this memorandum.

Attachment #6 – Comments from Chris Ewers

Comments provided by Mr. Ewers focus on Section XVII (Transportation) of the IS Checklist and how the project is not consistent with the City’s Level of Service (LOS). These comments are addressed in Part II of this memorandum.

Part II: Response to Overall Project Comments

The most common neighborhood concerns regarding the project are related to traffic, parking, and density. The concerns are addressed below in further detail.

Long Term Traffic Impacts

The project zoning and intensity is consistent with the City’s Traffic Demand Model (TDM) for future buildout. Since the project is consistent with the TDM and will only generate 12 p.m. peak-hour trips, there is not a need to perform a long term traffic study. Also, the Traffic Area Zone (TAZ) for this project indicates there is a surplus of 18 p.m. peak-hour trips that are available, so the City’s TDM is conservative for this area.

Short Term Existing Traffic Impacts

Staff acquired three days of traffic data for Nevada Avenue peak hour trips, ADT and average delays at the Douglas Blvd intersection. It was determined that the traffic characteristics of Nevada Avenue were in line with what standard traffic practices would assume for a residential roadway. Following are the averages observed over the three days data was collected:

- **Average peak hour trips:** 47 trips (This is in line with ITS trip rates of 1 peak hour trip per DUE. There are 57 homes on Nevada Avenue, so the traffic model would assume 57 peak hour trips)
- **Average daily trips:** Approx. 500 (This is in line with 570 daily trips that would be assumed in the traffic model)
- **Average delay @ Douglas Blvd intx:** Less than 30 seconds on average, with a couple outliers that occurred during the peak hour reaching 45 seconds.

Overall, the existing traffic in the vicinity of the proposed project can be categorized as average to below average for the infrastructure in place. As shown from the traffic data above, Nevada Avenue functions at a

level to be expected by a residential roadway. Douglas Blvd. is a four lane arterial roadway capable of handling up to 32,000 vehicles a day and still operate at level of service C. Douglas currently accommodates 20,000 vehicles a day and the nearby traffic signal at Douglas/Keehner operates at LOS A. Lastly, there has been no history of excessive accident rates recorded in the immediate vicinity of the proposed project.

Short Term Existing + Project Traffic Impacts

The proposed project is anticipated to create an additional 12 peak-hour trips, in addition to the 47 peak-hour trips that were observed for existing conditions. These anticipated 59 total peak hour trips are not expected to substantially increase delays at the Nevada Ave./Douglas Blvd. intersection. In addition, the proposed ingress only driveway on Douglas Blvd. was designed to ensure that the majority of vehicles entering the site do so from Douglas Blvd. This proposed driveway will drastically limit the number of additional trips created by this project that will impact existing neighborhood streets, including Nevada Ave.

Due to the low volume of vehicles that will be accessing the proposed project and the low volume of vehicles egressing Nevada Avenue, staff anticipates only nominal increases in delay times egressing Nevada Avenue. In addition, sight distance to the east will be greatly improved with the removal of the existing structure and landscaping currently on the site.

Parking

Residents in opposition of the project are concerned that the project does not provide an adequate amount of parking for residents and guests. The project proposes 23 for-sale, single-family dwelling units. As discussed in the Design Review Permit evaluation of the staff report, the Zoning Ordinance parking requirement for single-family dwelling units is based on a ratio of two (2) parking spaces for each unit. The project proposes a total of 23 units, resulting in a parking requirement of 46 spaces. Each unit is designed with a standard two-car garage to satisfy this requirement. Guest parking is not required for single-family dwellings, although guests would be able to utilize the on-street public parking spaces located on Nevada Avenue. Residents anticipate this would negatively impact the availability of on-street parking for current residents.

In addition, there is concern that the garages would be utilized as storage space and would therefore eliminate space for parking. To prevent this from occurring, a condition of approval has been placed on the project requiring the CC&Rs to include a clause prohibiting storage in the garages that displaces vehicle parking.

Staff finds that the project is consistent with the parking requirements of the Zoning Ordinance.

Density

The proposed project would create a 23-unit small-lot subdivision, with dwellings designed as three-story, attached units. Several residents requested that the number of units be reduced. The applicant has indicated that the project would not be economically viable with a lower number of units. Without an economically viable project, there would be no incentive to redevelop and invest in infill areas, which is encouraged by the goals and policies of the General Plan.

The project has a zoning designation of Attached Housing (R3), which is considered an implementing zone for the proposed High Density Residential (HDR) land use. The HDR land use category is identified in the General Plan as normally developed with apartments or condominiums with multiple story structures containing multiple, attached dwelling units, with a density of 13 dwelling units or more per gross developable acre. The project site is consistent with the policies contained in the General Plan for an HDR land use type. The project proposes a density of approximately 26 dwelling units per acre, is adjacent to arterial streets, transit linkages, and in close proximity to commercial services. The HDR land use is typically used as a transition between commercial areas and lower density areas. The project site is a corner parcel, surrounded by both business professional/commercial uses and low-density residential uses. The proposed land use and density are appropriate and compatible with the surrounding area.

The City has adopted Blueprint Implementation Strategies for purposes of managing growth within the City. The strategies encourage compact building design and creating a range of housing opportunities and choices.

The project provides a unique housing product that will meet different household needs in an area having the potential for revitalization. This meets the intent of the Blueprint Implementation Strategies as well as the City's General Plan policies.

From: [Michael Ryan](#)
 To: [Shallow, Kinarik](#)
 Subject: Nevada Street Proposed Lofts File #PL18-0178
 Date: Friday, April 26, 2019 3:11:25 PM

Kinarik Shallow,

My name is Michael Ryan and I am one of the nearby residents that live on Douglass Boulevard near the proposed loft location. Speaking with quite a few of the neighbors and reading the mitigated negative declaration that was issued to the public, I have a few concerns that I would like addressed before the decision is made on this project.

Construction Activities

1. My work background is construction management, so reviewing this report, naturally I have a lot of questions. As I am reading this document I do not see anything regarding where construction employees will be parking or how they will be getting to the site. With Donner being a convenient way to go down then northbound on Ben-Ezra st is very concerning for myself and my family. These construction workers will be taking up street parking in front of my house. Not just this, however Ben-Ezra is very narrow and only allows one way traffic at a time. This is a problem for residents trying to get to the light on harding traveling east when a dump truck or concrete truck is going west.

- How does the general contractor/developer plan to mitigate the construction parking situation?

- How does the general contractor/developer plan to navigate the construction required driving around the site?

2. While my family does not work at night and sleep during the day, reading the report, it does not say if they have walked around and asked if this applies to certain homes/families. It states that only ambient construction noise at 60 db will be spread and the box checked "less than significant". Having worked on MANY outside jobs that are relative to this size, this statement is blatantly not truthful. 60 db is about the sound a lawnmower makes. With the amount of work that is needed on this job, it will be much higher than this. I have a link below that shows a diesel truck to be about 100 db. <https://www.pavementinteractive.org/reference-desk/pavement-management/impacts/construction-noise/>

- Whoever created this report, can they describe the means and methods they used to get the number of 60 db? The community needs time to review the accuracy of this report.

- Whoever created this report, can they explain why the misleading statement is made when a simple google search shows otherwise?

- With one small falsehood comes many more, large and small. Does the City of Roseville trust this report 100%? Has the city made a counter review of this document?

- Why was there not proposed working construction hours put into this report? Most construction jobsites start at 6/7 am, and end around 3/4pm.

- Why was there not a survey of the existing residents that work at night and sleep during the day?

- Page 35 states that the house on the site is currently abandoned. This is not true. There is a homeowner there, as well as multiple vehicles. Is there a reason why this falsehood was incorporated into the report?

3. As with any construction project there will be delays. These include weather, contractor error, and unforeseen events.

- The report gives a brief timeline of completion, however there is no mention if they have included delays due to weather. The construction period 9/1/19 - 2/20/19 are during the wettest months of the year. Have they considered this? Reading the report they do not make a statement of this.

Building Construction Materials/Methods:

- I have been told time and time again that CA is the leader in green energy and reduction of greenhouse gases. Reviewing this plan as well as the photos associated with this, there are zero charging stations for electric vehicles. Is there a reason why this was not incorporated into the planning? For a complex such as this, I would think there would be at least 2 charging stations for tenants.
- CA just passed a law that all new homes must have solar cells at the time of construction. The photos do not show a reflected roofing plan, however it does not appear in the report to reflect the installation of these green or LEED items, with the construction finishing in 2020, how does the law effect this new construction? Is there an exception to this rule because of the high density nature of these buildings?
- The report has no direction of if the building will be constructed with green energy efficient materials. Is there a reason why this isn't implemented into the report?
- The current site photo shows approximately 2/3 trees that will be removed. Are there any plans to plant smaller trees in their place?
- The current elevation photos call for a rooftop lounge to be on these lofts with no safety guard rails. We all know late nights mixed with alcohol can lead to poor decisions. What are the current elevations from the roof deck to the top of the parapets shown?
- Noise does travel more at night, and with little line of sight obscuration (trees/other buildings) the noise traveling from late night parties at the roof tops will travel. I do not see a study on the noise traveling at night from that height and how it may effect the neighboring houses. There should be one done and given to the neighboring residents for review.
- Part I gives an aesthetics review. The checklist gives a "no impact" to the question "Have a substantial adverse effect on a scenic vista". This neighborhood may not be classified as a "Scenic Vista" however it has some of the oldest homes in the area, and they are historic in nature. It seems that this question was selectively left off of the report to show a favorable rating in this aspect. Is this finding acceptable to the city with the historic nature of this neighborhood?

Post-Construction:

- A harvard study (link shown below) shows that over time the price of single family homes on average in the surrounding area does decline with the construction of apartments or high density living areas. If this in fact true, is the city willing to accept the lower property taxes paid based on the decline in these home values? Searching the report, there does not seem to be a study conducted on this matter. If this proposal does get approved, the city will now be collecting property taxes on 23 new "lots". Is the city planning to reduce the tax rate of the current nearby residents in lieu of new taxes? Has the city already decided or put forth plans on how to spend these new tax dollars for street improvement, local education, social services, police enforcement, etc?

www.jchs.harvard.edu/sites/default/files/rr07-14_obrinsky_stein.pdf

- Is the city of Roseville giving any financial aid, grants, credits, deductions for the construction of this project? If so please advise on what bonds/measures this correlates to.

-On the previous Dutch Bro's proposal, there was no mention to mitigate traffic after construction with all of the new traffic Donner was going to receive (even within their proposal it was grossly underrated). Has the city considered installing speed humps/bumps on Donner to slow down traffic coming in from Douglass? Currently at least 6/7 times a day (when I am home 5pm-7am people come down this street speeding what I can assume 40/50 mph trying to avoid the stop sign on Harding to get to downtown Roseville. As someone who is starting a family in this area, how fast people come down Donner is VERY important to me. Why does this report not offer this type of traffic control for what common sense will show as the main thoroughfare for these loft residents? (douglass to donner to ben-ezra. This is also not mentioned in the "Residential Growth" section of the report. Nevada St. has these speed mitigation measures, why is Donner the exception?

- Have there been any proposals by the city or others to "beef up" ben-ezra for what we all know will happen for these future residents (go down donner to ben-ezra to nevada)? There are currently no stop signs at either points of Ben-Ezra until you get to Harding. This is unacceptable.

- There is no mention of the mitigation of guest parking at the Lofts in the report, however it does show 60' of available parking at the west side of the project. Has this been deemed enough? Are guests allowed to park on the spaces already allocated for current residents of Nevada St? Has a study been done to see if guests will just pull from Nevada to Donner and take up current resident parking on Donner? Reading this report, it has not been done. Speaking for the residents near this proposed development I believe this needs to be considered. If overcrowding does occur on Nevada and Donner, are the residents permitted to call a tow truck if a car is directly in front of their property and there are no more available spots for the resident?

- The report notes that there will be "no impact" to the nearby schools if approved. Some simple math shows that 2 children per household = 56 new children at public schools which is approximately 2 whole classrooms k-12. Has the city prepared financially for the increase of children in the classroom at nearby schools for the various grade level increases? This is another example of a falsehood given in the report.

Overall Impression:

Most of the reports/reviews give a "less than significant impact". This document says that it has been created to satisfy the CEQA, however it does not state that the organizing party has any affiliation with the developer or architect. This review seems like it is too good to be true, history tells us that this is quite the result. Is there one single organization that has created this or is it an independent third party that does not have any affiliation with the ownership/developer/architect firm? Granted that the city residents have a duty to review this, has there been a report created by they City Planning department to challenge any of these findings? **Reviewing this report had me question a lot of the findings and after minimal research, there were quite a few falsehoods portrayed in the report (as found above) and that is concerning. I stated this before, if the reporting party is willing to lie about small things, there will be bigger lies to come later.**

Thank you for your time,

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Michael Ryan
808-754-5295
michael.ryan0861@gmail.com

April, 29th, 2019

Development Services Department
Planning Division
311 Vernon Street
Roseville, CA 95678

RE: Old Town Lofts File # PL1-0178

Attn.: Planning Division,

I take to differ to the following certain items on the Initial Study Check list.

XI a - Physically divide an established community.

Response; By allowing the land to be rezoned for high density housing the new crammed 23 unit housing does not conform to the existing landscape of the neighborhood it surrounds which are the small single type family homes

XVII b - Conflict or be inconsistent with CEQA Guidelines section 15064.3 (b)?

Response; The 3 visitor spots does not seem adequate for the planned 23 units. Even though with the units having 2 car garages there is a chance of families having more than two cars per unit and we are concerned where they will park. Since the parking along both sides of Nevada adjacent to the proposed project has been taken away where will all the extra cars and visitors park?

Does the large master traffic study that was completed a few years back for all of Roseville conflict with the stated project's traffic study? Douglas is already a very busy road with people leaving and entering the complex during peak time is probably going to have a negative impact on the traffic in our neighborhood.

What is the city's future plan for Douglas Boulevard (between Folsom and Vernon)? Is there a plan or one in the works?

Regards,



John J Spalding
215 Donner Avenue
Roseville, CA

From: [Jeff Dodge](#)
To: [Shallow, Kinarik](#)
Subject: INFILL PCL 246 - Roseville Old Town Lofts (File #PL18-0178)
Date: Monday, April 29, 2019 4:02:30 PM

I didn't have enough time to go through all the documentation in detail, so I just have some general comments, which for me are of great concern.

First of all, I'm not opposed to the type of structure proposed, but I feel strongly that it's in the wrong location. The impact to the surrounding homes presents a number of problems

- 1- Aesthetically, it seems inappropriate to remove one's vista by placing such a tall structure so nearby. In the very same area there are code issues with regard to erecting anything above a certain height for the very reason that it steals the aesthetic beauty one can normally experience in an older neighborhood such as this. Newer developments are a different story, of which there are many areas more suitable in West Roseville, for example.
- 2- The increase in traffic appears problematic, especially being that the intersection in question is unable to have its own traffic signal due to its proximity to the existing signal on Keehner.
- 3- Zoning seems odd. With the increase in traffic along Douglas Blvd, it would make much more sense to place a business at this location.
- 4- Parking is an issue. While the plans account for parking of residents, there's no on-street or off-street parking available for guests/visitors. It's expected then that people seeking parking when visiting the residents of the existing homes will find it hard to find parking. Generally, high-density living is connected to areas with a high degree of walkability or with nearby overflow parking.

Thank you for considering these items. My sincere hope is that the developer can find a better location (of which I'm sure there are many) that everyone can get behind.

Old Town Lofts Project – 241 Nevada Ave

Building 23 row houses in this lot, is the wrong type of development for the Folsom Road Neighborhood.

After carefully reviewing all the project plans, here are my comments referring to the Initial Study and Environmental Impact.

1. In *Land Use and Planning Sec XI*, Zoning change is proposed from BP (Business Professional) to R3 (High Density) is discussed. In *Population and Housing City's, Sec XIV* it states "*These additional residential units were not contemplated in the City's General Plan. The City has additional infrastructure accommodate the increase. Project will not result in additional infrastructure.*". I can't imagine ANY place on Douglas that would be suitable. This location is one of the LEAST suitable locations.
2. In *Energy Sec. VI*, it states that "*Its proximity to many resources, it will have lower than average vehicle trips*". This is NOT a valid statement. The residents will use their vehicles to visit businesses and will not walk.
3. In *Biological Resources Sec. IV*, I understand 19 Oak trees will be removed to accommodate space for the buildings. Could the number of units be reduced, and trees left in place?
4. In *Hydrology and Water Quality Sec X* it states that there will be no impact. Having lived in the neighborhood for 30 years, I have seen frequent flooding from storm drains on this low section of Douglas Blvd. I understand that currently there is a major storm drain project underway across Douglas in the Hillcrest Neighborhood. I feel that there would be a need for the same infrastructure investment by City (Storm drains, waste water, fresh water) in this area on Nevada Ave.
5. In *Transportation Sec XVII*, it states that there will be no transportation impact. The design of ingress and egress into project from Douglas is a MAJOR traffic hazard, and the City would encounter great liability. A possible solution would be a new traffic light at Nevada and Douglas. If this was designed into the project, it would represent significant cost for the City

Werner Kuehn

Werner Kuehn 193 Park Drive, Roseville, CA 95678 916-367-2524



6.





Mitigated Negative Declaration

Project Title and File #: INFILL PCL 246 – Roseville Town Lofts, File #PL18-0178

Project Address: 1007 Douglas Blvd. (Nevada Ave.)

Project Planner: Kinarik Shallow, Assistant Planner

Public Comments: Ronald McCary

183 Nevada Ave. Roseville, Ca. 95678

(916) 847-9168 rsmccary@juno.com

Date: April 30, 2019

X. Hydrology and Water Quality

Would the project:

- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 - i. result in substantial erosion or siltation on or off-site;
 - ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site;
 - iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater systems or provide substantial additional sources of polluted runoff; or
 - iv. impede or redirect flood flows?

Discussion of Checklist Answers:

c (ii and iii)) The project has been reviewed by City Engineering staff for conformance with City ordinances and standards. The project includes adequate and appropriate facilities to ensure no net increase in the amount or rate of stormwater runoff from the site, and which will adequately convey stormwater flows.

Public comments: Ronald McCary, 183 Nevada Ave. Roseville, Ca.

Potentially Significant Impacts related to checklist items C(ii) and C(iii):

The Tentative Subdivision Map property information table establishes a 50% requirement for "Site Coverage". This is defined as the "livable" building space – foot print. In terms of physical reality, the rough calculations of the square footage for all building footprints plus on-site hard surfaces (road and sidewalks) is much greater. A ratio for this impermeable surface area appears to be more like 67% as highlighted here. This factor is not accounted for in the "standards", but it is a potentially significant impact to stormwater runoff. We do experience extended and hard rainfalls. Buildings and hard surfaces shed water rapidly. This represents a significant net increase in the amount or rate of stormwater runoff from the site.

What specific City ordinances did the City Engineering staff use to support the conclusion of adequate capacity to convey stormwater flows? Did they examine the existing stormwater drainage capacity upstream to the site? Are there potential conditions upstream that may compound problems to stormwater flows exiting the site? Is there proof that a Hydrologic Study exists to indicate a 100 year storm can be absorbed by north property existing 36" ACP drain pipeline (at slope of 0.0062) per Placer County regulations?



XIX. Utilities and Service Systems

Water and sewer services are provided by the City of Roseville. Existing utilities such as water, sewer, and storm drain lines are located within Nevada Avenue and Douglas Boulevard. Storm water will be collected onsite and transferred via the existing storm drain system into an off-site storm drain system. Solid waste will be collected by the City of Roseville's Refuse Department. The City of Roseville will provide electric service to the site, while natural gas will be provided by PG&E. Comcast will provide cable. The project has been reviewed by the City's Engineering Division, Environmental Utilities, Roseville Electric and PG&E. Adequate services are available for the project.

Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

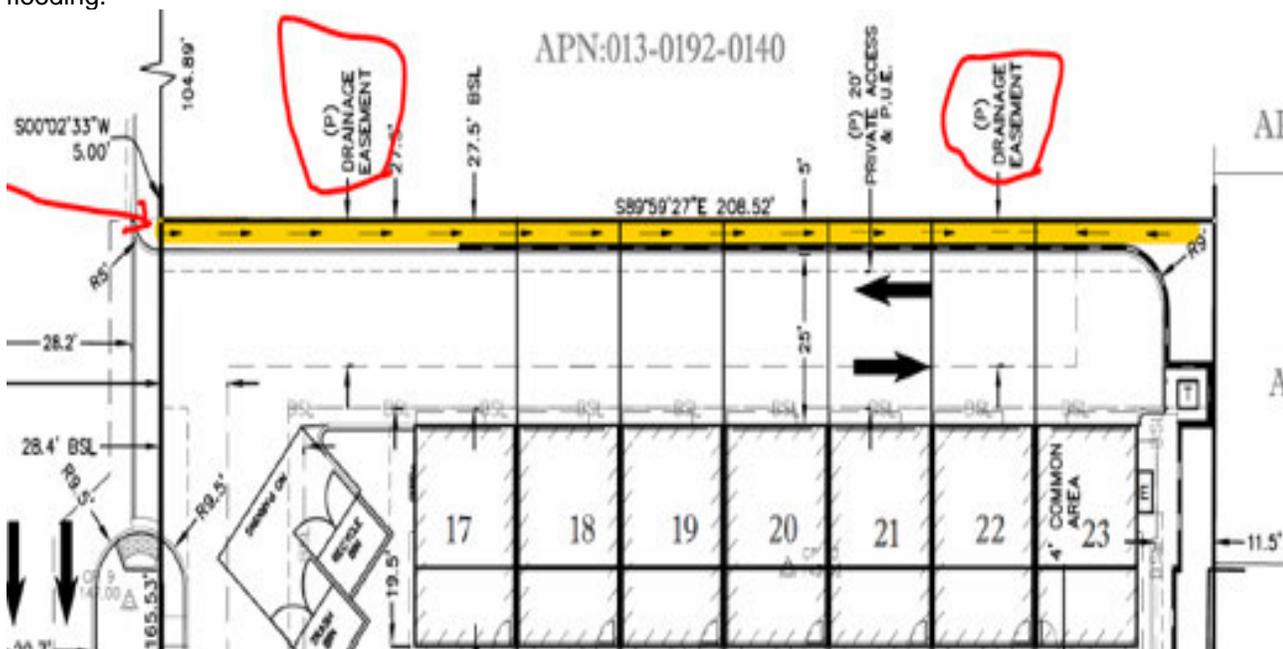
Discussion of Checklist Answers:

a) Minor additional infrastructure will be constructed within the project site to tie the project into the major systems, but these facilities will be constructed in locations where site development is already occurring as part of the overall project; there are no additional substantial impacts specific or particular to the minor infrastructure improvements.

Public comments: Ronald McCary, 183 Nevada Ave. Roseville, Ca.

Potentially Significant Impacts related to checklist item a)

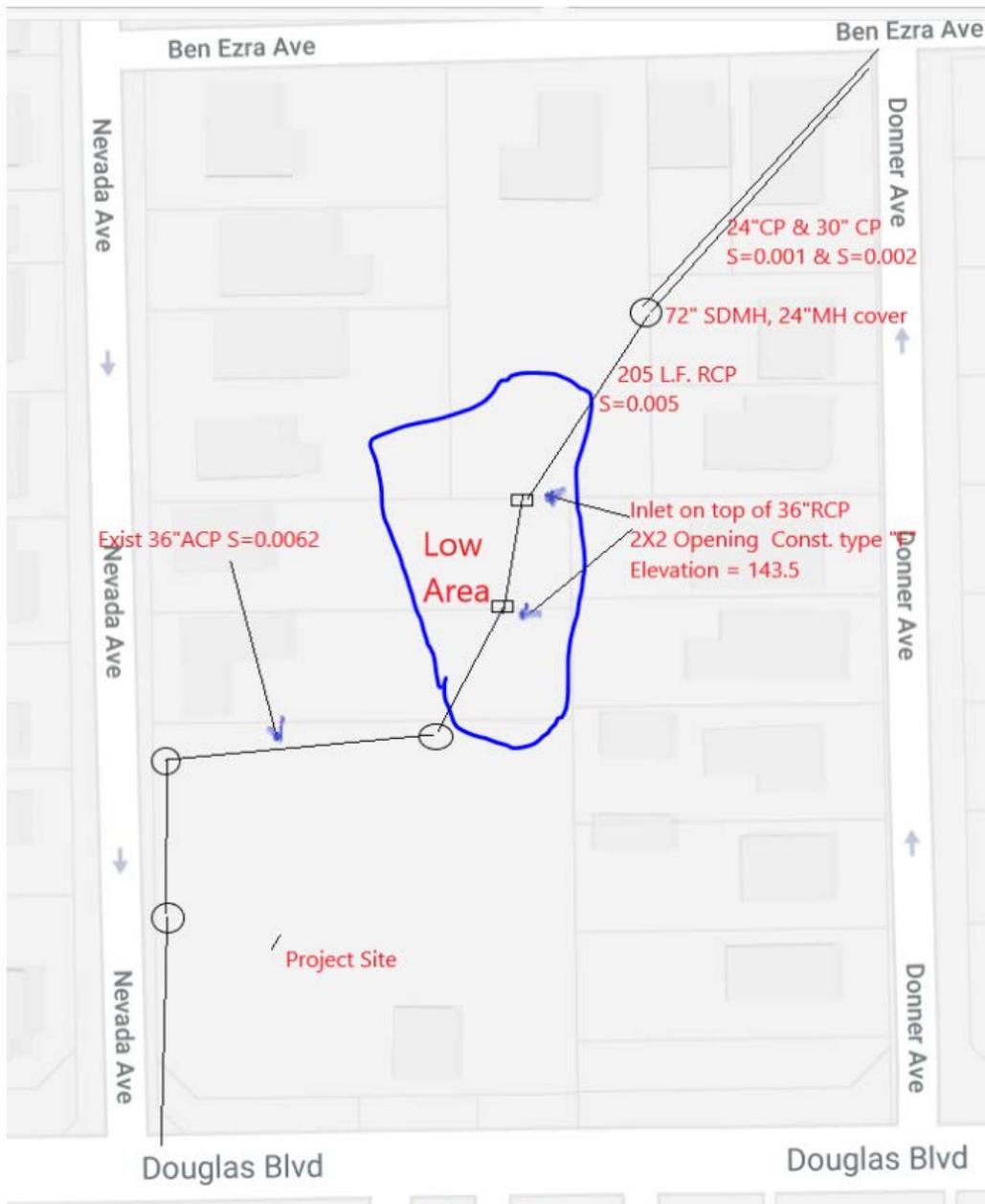
1. Ditch/Flowlines are symbolized by directional arrows on the Tentative Subdivision and Grading Maps. These arrows are most problematic along the 5' drainage easement running with the north boundary - east to west. Arrows indicate a predominately eastern drainage flow toward the North/East property corner. At a location approximately 20' west of that corner, the arrows indicate an opposite Easterly flow for the last distance to corner. This appears to indicate a low collection or ponding area in the drainage easement at 20' west of the properties corner. This low area potentially impacts the drainage easement on the north side of a proposed block wall structure exposing the north neighbor to levels of flooding.



2. For properties to the north of this low water collecting area, there are existing physical conditions and topologies of land terrain. The drainage ditch and flowline changes of this proposed project will set up potentially significant impacts related to flooding. This drawing presents the existing drainage infrastructure upstream of the proposed stormwater

system. The blue outline is a low depressed elevation area affecting at least 5 properties. In 1989 City of Roseville installed the drainage system as depicted. Two Const. type F inlets are set at two property lines in the low zone (see elevations). These two inlets are connected further downstream to a 60" SDM with flat top 24" grate cover at FL=143.5 assumed to be object "D7" on the Grading Map. The stormwater drainage continues west, on project site, with a 36" ACP slope=0.0062. Existing infrastructure has substantial additional impacts specific and particular to the infrastructure improvements accounted for in this site project.

Has the City Engineering Staff considered the potential limitations of existing infrastructure and physical conditions of this low area? Is there expert opinion in form of a Hydrology Study to confirm the impacts of added stormwater demand relative to this lower elevation zone and potential water backup in proposed project site drainage? Should these bordering neighbors be exposed to damages for essentially being the "reserve overflow pond" for poorly directed drainage flow and a boundary wall Dam at this low elevation North/East corner?



XVII. Transportation

The project site has frontage on both Douglas Boulevard to the south and Nevada Avenue to the west. Douglas Boulevard is a four-lane arterial road at this location, and Nevada Avenue is a single-lane, one-way street. Access into the site will be provided by a 20-foot driveway off of Douglas Blvd. that will be located on the southwest portion of the site. The driveway will be restricted to vehicular ingress only. Vehicles will exit the site on the northwest portion of the property, onto Nevada Ave. Additionally, there will be two 20-foot wide internal drive-aisles providing access to each of the units. The residential units will include a two-car garage and there will be three on-street parallel parking spaces along Nevada Ave.

Would the project:

- a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?
- c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- d) Result in inadequate emergency access?

Thresholds of Significance and Regulatory Setting:

CEQA Guidelines Section 15064.3 indicates that a project's effect on automobile delay cannot be considered a significant impact, and directs transportation system analysis to focus on vehicle miles traveled (VMT), per checklist item b. However, the CEQA Guidelines also include consistency with a program, plan, or policy addressing transportation systems as an area of potential environmental effects (checklist item a). The City has adopted the following plans, ordinances, or policies applicable to this checklist item: Pedestrian Master Plan, Bicycle Master Plan, Short-Range Transit Plan, and General Plan Circulation Element. The project is evaluated for consistency with these plans and the policies contained within them, which includes an analysis of delay as a potential policy impact. The Circulation Element of the General Plan establishes Level of Service C or better as an acceptable operating condition at all signalized intersections during a.m. and p.m. peak hours. Exceptions to this policy may be made by the City Council, but a minimum of 70% of all signalized intersections must maintain LOS C. The Findings of the Implementing Procedures indicate that compliance with the Traffic Mitigation Fee (RMC Ch. 4.44) will fund roadway projects and improvements necessary to maintain the City's Level of Service standards for projects consistent with the General Plan and related Specific Plan. An existing plus project conditions (short-term) traffic impact study may be required for projects with unique trip generation or distribution characteristics, in areas of local traffic constraints, or to study the proposed project access. A cumulative plus project conditions (long-term) study is required if a project is inconsistent with the General Plan or Specific Plan and would generate more than 50 pm peak-hour trips. The guidelines for traffic study preparation are found in the City of Roseville Design and Construction Standards—Section 4. For checklist item b, the CEQA Guidelines Section 15064.3 establishes a detailed process for evaluating the significance of transportation impacts. In accordance with this section, the analysis must focus on the generation of VMT. Projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to have less than significant impacts, as should any project which will decrease VMT when compared with the existing conditions. VMT may be analyzed qualitatively if existing models or methods are not available to estimate VMT for a particular project; this will generally be appropriate for discussions of construction traffic VMT. Impacts with regard to items c and d are assessed based on the expert judgment of the City Engineer and City Fire Department, as based upon facts and consistency with the City's Design and Construction Standards.

Discussion of Checklist Answers:

a) The City of Roseville Engineering Division evaluated the need for a long term and short-term traffic study and prepared a trip generation estimate. The anticipated number of trips generated by the project is 12 pm peak hour trips. Since the project will not generate more than 50 pm peak-hour trips, a traffic study is not required, and it can be concluded that the project will be consistent with the City's Level of Service standards. The City of Roseville has adopted a Pedestrian Master Plan, Bicycle Master Plan, and Short-Range Transit Plan. The project was reviewed for consistency with these documents. The surrounding pedestrian, transit, and

bicycle facilities have been already been constructed and the project will not decrease the performance or safety of those facilities. The project is consistent with these plans; impacts are less than significant.

b) Although the City of Roseville currently has no VMT standards, the project is expected to be consistent with the intent of implementing the VMT metric due to the proximity to existing transit stops. For example, the site is located within one-half mile of two bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. These transit stops are located at Douglas Boulevard and S Lincoln Street, and at Douglas Boulevard and Donner Avenue. The project site is also located in close proximity to bikeways and sidewalks, which would encourage alternative modes of transportation. Therefore, impacts with respect to this criterion will be less than significant.

c, d) A new, modified Type A-7 driveway measuring 20 feet wide will be constructed on Douglas Boulevard, on the southwest corner of the site, which will be restricted to ingress movements only. A modified Type A-7 driveway measuring approximately 40 feet wide will also be constructed on Nevada Avenue, on the northwest portion of the site. This driveway will restrict egress movements to left turn only, however it will allow for vehicles to enter the site from Nevada Avenue. Nevada Avenue will be improved with a road width of 20 feet and will include three (3) parallel parking spaces on the east side of Nevada Avenue with five (5)-foot wide sidewalks constructed along the limits of the property. Nevada Avenue will be wide enough to provide space for two (2) vehicles to egress onto Douglas Boulevard; this improves circulation and minimizes vehicles queuing at the intersection by allowing for a left and right turn lane. Additionally, the proposed site design includes a 20-foot travel lane within the subdivision, allowing for appropriate circulation throughout the site as the main drive aisle will be wide enough for two-way traffic. The internal drive aisles to the units will also be 20 feet wide. The project has been reviewed by the City Engineering and City Fire Department staff and has been found to be consistent with the City's Design Standards. Furthermore, standard conditions of approval added to all City project require compliance with Fire Codes and other design standards. Compliance with existing regulations ensure that impacts are less than significant.

⁵ A site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. (Public Resources Code Section 21064.3)

⁶ A corridor with fixed route bus service at service intervals of 15 minutes or less during peak commute hours.

Public comments: Ronald McCary, 183 Nevada Ave. Roseville, Ca. 95678

Potentially Significant Impacts related to checklist items b):

Can the City arbitrarily make an assumptive standard for a Vehicle Miles Traveled (VMT) metric based on "intent" of implementing the VMT metric? To say the project is "expected" to be consistent with this imaginary "intent" of implementation is not conclusive. Having existing transit stops nearby is not enough to justify that this project is "expected" to be consistent with the intent of implementing a VMT metric standard! This short circuits the fair evaluation of what is "Significant Impact".

As the City has stated, NO current VMT standards exist. Are such standards to be eventually adopted by the City? What traffic engineering methodology supports the 12 pm peak hour trip "estimate"? Would that estimation process be consistent with results obtained in an independent long/short-term Traffic Study? The City's Level of Service standards rely a clear and accurate calculation of trip generation.

Potentially Significant Impacts related to checklist items c, d):

Twenty-Three (23) Rowhomes on a .89 acre lot at the corner of Nevada/Douglas add 43% more properties to the 57 total existing properties on Nevada. This is a significant negative impact on our street density, traffic flow, parking and emergency response access.

Curbside parking North to South on Nevada is a constant cause for public safety issues: traffic flow, children playing, emergency response, and of course, the frequent "Wrong Way" vehicles. This Initial Study regretfully does not consider existing parking burdens from the office complex at 1039 Douglas Blvd. (See aerial photo). Consistent overflow parking

from employees to clients fill both sides of Nevada Ave. at curbside parking. There is an interconnected relationship between the Office complex parking and the surplus off-site parking burden generated from twenty-three Rowhomes. The ingress/egress ramp to the Office complex is directly across from the rowhome project and faces the proposed three (3) space "Guest" parking slots allocated to the 23-unit Rowhomes. Initial Study discussion of item c, d describes Nevada Ave. narrowed down to twenty-one (21) feet from its current twenty-eight (28) feet. Claiming this is still wide enough to provide space for two (2) vehicles to travel side by side to egress onto Douglas Blvd. and minimize vehicle queuing at the intersection. This seems to assume that there will never be parking along the West curbside of the street near the Office complex (See aerial photo). Will the City find "after the fact" that a Red curbside No Parking zone will be required?

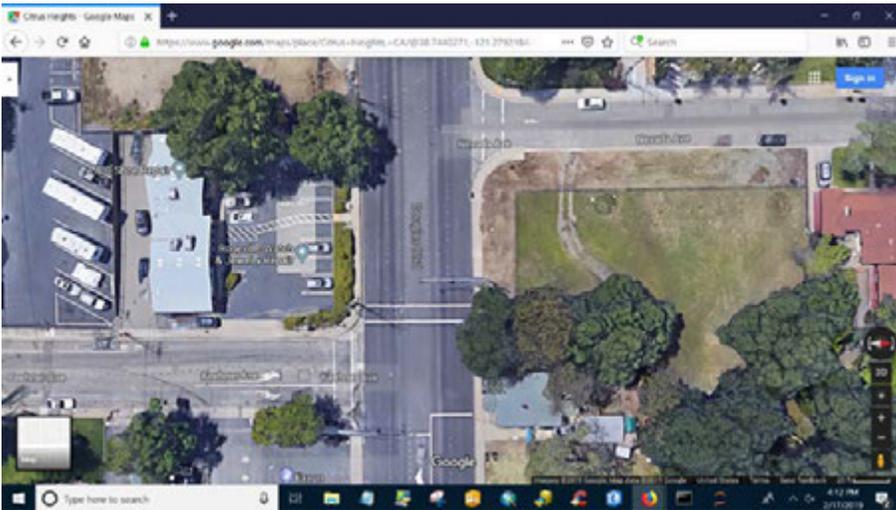


In addition to the added burden of off-site visitor parking for the proposed project, consider the effect of a new A-7 driveway constructed to enter the proposed project. This effectively creates a 5 to 8-foot wide curb style island separating the old modified Nevada Ave. and new parallel, on-site roadway. Traffic circulation at this close-proximity to the dual intersections of Keehner Ave. traffic signal to the east on Douglas Blvd. and the parallel intersections of new project entry at Nevada Ave. obviously raise concerns about public safety. These are already dangerous intersections and this project, as proposed, has a potentially significant impact on the relationship of these intersections.

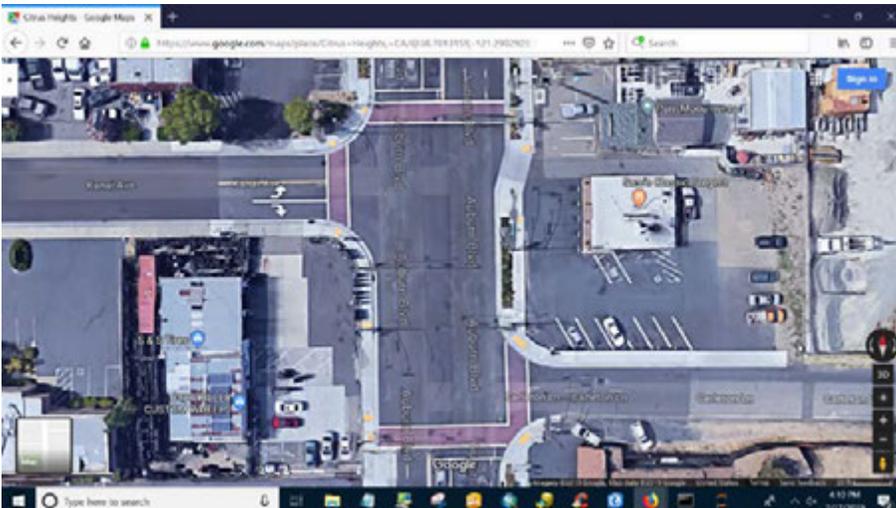
Nevada Ave. at Douglas intersection sits at a low point with respect to Douglas east and west elevation making it hard to judge down-hill vehicle rate of travel and distance. The Keehner traffic signal allows westbound through traffic while at same time creates appearance of stopped traffic with vehicles in the southbound Keehner turn lane. Additionally, the Keehner traffic signal is configured for westbound turns onto Douglas which frequently conflicts with Nevada eastbound turnouts into Douglas. These are all hazardous conditions that are integral to the evaluation to whether this proposed A-7 driveway coupled up to Nevada Ave. egress requires a more comprehensive traffic study.

Is the City willing to mitigate the increased risk to public safety by installing a new second traffic signal at Nevada Ave. and Douglas intersection, synchronized with the Keehner Ave. traffic signal? Citrus Heights City has a prime example of dual synchronized traffic signals at the intersection of Auburn Blvd., Kanai Ave. and Carleton Lane. The two side streets, Kanai and Carleton off busy Auburn Blvd. are nearly identical (75' apart) as Nevada and Keehner at Douglas (See aerial photos). Their traffic signals enhance safe motoring and pedestrian foot travel for the local business establishments and serve as a perfect model for the City of Roseville.

Roseville Ca. ___ Dual Intersections at Douglas Blvd., Keehner Ave. and Nevada Ave.



Citrus Heights, Ca. ___ Dual Traffic Signal Intersection of Auburn Blvd., Carlton Ln. and Kanai Ave.



ATTACHMENT 6

Chris Ewers
209 Donner Avenue
Roseville, California 95678
30 April 2019

Kinarik Shallow
Planning Division
311 Vernon Street
Roseville, California 95678

Re: IS/MND comments, Roseville Old Town Lofts, File #PL18-0178

Dear Mr. Shallow:

In the absence of City of Roseville guidance through its Roseville General Plan and Downtown Specific Plan, a developer has proposed the maximum individual dwellings per foot on the lot at 241 Nevada Avenue. In leaving the Douglas Boulevard corridor's planning and vision ambiguous, the City essentially requires that each development either go forward or be stopped by public opposition. This terrific waste of developer and residents' time and efforts should be resolved with a City-established vision and plan for the Douglas Boulevard corridor. With such a plan in place, developers and residents would know what would be permissible and workable without having the fight site-by-site over the same issues.

Douglas Boulevard is a major arterial, according to the Downtown Specific Plan (Exhibit 6.1). Even in that document, adopted 10 years ago in April 2009, planners note the congestion at I-80 and Douglas and at Douglas and Riverside were considerable. And though we have implemented some changes at Douglas and Riverside, there are no proposals for alleviating that congestion at I-80 and Douglas. The City has experienced (conservatively) 17-20 percent growth since 2010. It is now common to experience backups on Douglas Boulevard stretching more than 3,300 feet from I-80 to the east, and to have locked-up traffic (levels of service [LOS] D-F) from I-80 west to Folsom Road. The City's standards for development state the LOS should be a C or better in 70 percent or more of the intersections.

From City staff comments gathered over the past two years in discussions around the proposal to site a Dutch Bros Coffee kiosk at the corner of Douglas and Donner, the City has substantial traffic planning resources at its disposal, including existing studies that have been developed into a predictive traffic model.

Despite this preponderance of evidence of significant environmental impact from traffic, the City has not used any of the tools in hand to determine the impact of this

proposed development, citing an interior administrative guideline that any development with less than 50 pm peak-hour trips can be ignored and presumed "consistent with the City's Level of Service Standards" (IS/MND p. 37). This conflicts with the City's intention that the Amoruso Ranch Specific Plan EIR be used to provide the environmental impact assessments under CEQA guidelines "except as may be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site" (IS/MND p. 4). In fact, using this administrative rule to ignore evidence of significant impacts brings the City into conflict with CEQA, which requires that an EIR (not an IS/MND) must be prepared when there is substantial evidence in the record that supports a fair argument that significant effects may occur (PRC §21080(d)).

Unfortunately for the developer and City residents in this area, we are left to guess about the level of density that the City would allow. From the findings in the IS/MND's section XVII of "Less than Significant Impact" for items a-d, it appears that 10,000 new residences along the Douglas Boulevard corridor will work within CEQA guidelines as long as they're packaged at 50 pm peak-hour trips or less. But we know that's not the case because the City is recording LOS levels of D-F without any new development on Douglas Boulevard. And as we are aware, a LOS of D-F along Douglas Boulevard affects every item associated with IS/MND section XVII items a-d:

- a: Conflicts with the City's development guidelines and standards.
- b: Presumably conflicts with CEQA Guidelines section 15064.3, subdivision (b), though the City has not considered this evaluation under an administrative guideline that conflicts with CEQA intent and implementation.
- c: Cross-traffic conflicts with a new, unsignalled intersection at a driveway now serving a minimum of 23 new units (46 drivers) in a nonstandard configuration decreases the safety of everyone who lives along and uses the Douglas Boulevard arterial.
- d: LOS D-F along Douglas Boulevard impedes emergency vehicle ingress and egress, locking up the emergency responders with the rest of us drivers.

In summary, the City's checklist answers for the IS/MND section XVII of "Less than Significant Impact" are based on an internal guideline that contravenes the intent and implementation of CEQA, which creates a liability for the City with no discernable balancing benefit. As a resident of the area on Donner Avenue, I wish to see the City provide guidance to developers and residents in a vision for what can be done on

30 April 2019

Page 3

Douglas Boulevard and in the neighborhoods adjacent to it to maintain its integrity and character. As a resident of Roseville, I know we have much better places to put our tax funds than paying the legal fees associated with defending the City (and likely losing) against legal challenges brought because the City decided not to do the analysis.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Ewers", with a long horizontal flourish extending to the right.

Chris Ewers
(916) 521-9696

From: [Charissa Lott](#)
To: [Shallow, Kinarik](#)
Subject: Project - Roseville Old Town Lofts
Date: Wednesday, April 24, 2019 10:56:46 AM
Attachments: [Screen Shot 2019-03-14 at 2.21.24 PM.png](#)

Good morning,

I am reaching out regarding the proposed lots on Nevada Avenue. A neighbor of ours on Donner Avenue received the public hearing notice regarding this proposed project. My husband and I have owned our home for 19 years on Nevada Avenue, which is right near the alley (Ben Ezra) so I am surprised that we wouldn't received this notice since the impact will be much greater for homeowners on Nevada Avenue.

Our community just went thru the Dutch Bros. project and voiced concerns over traffic issues and that our small one way streets can just not handle the extra traffic. Having 23 units built at the end of our street would be just as bad. One could assume that would be at least an extra 46 vehicles driving and needing to park on a daily basis. This is a conservative estimate and doesn't include more than 2 vehicles per unit or guests.

We, as a family with our 2 children and dog walk almost every evening to either Garbolino Park or Royer Park. When walking to Garbolino, the route we take is down our street towards Douglas and crossing at the light on Keehner. The traffic is very heavy and goes very fast on Douglas. I don't always feel comfortable walking on Douglas with the speed of traffic.

On our street we frequently have cars that drive upwards of 50 miles an hour. On Easter Sunday, we witnessed an SUV almost hit a young child on the street. Last year a drunk driver coming from Old Roseville hit the power pole by our home and had the pole not been there the car could have gone into our yard or hit one of our children as it was only about 8 in the evening. This is a community that is out in their front yards socializing and lots of children playing.

With the infrastructure and improvements happening in downtown Roseville the flow of traffic on the surrounding one way streets by Royer Park has increased substantially.

Those are my comments and hesitation at having such a large project at the end of our street. My questions are:

- 1) Would these units be rentals or sold. If sold, could the new owner then make them a rental? Or, is this an HOA situation that would only allow for homeowners to live at the property.
- 2) Above, I mentioned the light at Keehner, how would that stoplight be impacted by a 23 Unit dwelling? Would that light be moved?
Would there be entrances and exits from that area for the dwellings that would make walking that portion of the sidewalk even more dangerous?
- 3) How would we exit Nevada Avenue to get onto Douglas. This is already a hard task during the busy morning or evening commutes. I often will go down Ben Ezra to avoid the traffic.

4) Is 23 already approved or could that number be lowered?

5) Will these units need to be built in a way that reflects the old home style of our neighborhood? We bought here for a reason. I don't want to have new style homes at the end of my street. That, in my opinion would decrease the value of my home.

I appreciate your time and look forward to hearing back from you.

Charissa A. Lott

Director of Operations

Capitol Advocacy

1301 I Street

Sacramento, CA 95814

Dir 916.273.1209

Wk 916.444.0400

clott@capitoladvocacy.com

www.capitoladvocacy.com



From: [Judy Fox](#)
To: [Shallow, Kinarik](#)
Cc: [Werner Kuehn](#)
Subject: Roseville Old Town Lofts
Date: Sunday, April 28, 2019 12:58:14 PM
Attachments: [IMG_9238.JPG](#)
[IMG_9236.JPG](#)

To: Sinarik Shallow
RE: Proposed project of 241 Nevada Avenue

I am a long time resident living at 200 Nevada Avenue and have several concerns not addressed in the IS/MND report... I will try and be brief.

1. Parking at the site and in the 3 spaces in the neighborhood is not sufficient.

Three spaces on Nevada for the loft residents is not sufficient! 23 families with their own cars and visitors (friends/families/babysitters/deliveries/etc.) will all be trying to drop by at various times. Most apartment units have many overflow parking places for guests and short term parking needs. I suspect the Loft residents themselves will also want to park on the street for convenience at times. And I know some will use their garage as storage and will need to park on the street.

Nevada Avenue already has ongoing parking issues. There are many "granny flats" and homes without garages that cars fill the streets with. Often times the front of my house parking is filled with unknown cars since there is no parking on Ben Ezra alley. (It's an issue for my gardener and friends with limited mobility.)

2. The neighborhood streets are not conducive to the extra traffic requirements.

This is an old historic neighborhood with narrow one way streets and a very tight 2 way alley. Many a time trucks with trailers attached cannot make the turn from Ben Ezra onto Nevada (we have to find owners to move parked cars and neighbors come out and direct).

3. Turning left onto Douglas Blvd from Nevada Ave is already bad

Douglas Blvd is already a nightmare as you know if you live here (I suspect you do?). Getting across Douglas from Nevada is hard, cars travel fast there. How are you going to address this with the additional needs of the loft residents? Perhaps a traffic light?

As a resident in Roseville for 25 years, I have few complaints. And they both belong to the planning department - HA. The first is traffic and for the life of me I cannot understand why you keep planning without having or including the infrastructure (i.e. access to and from) to support them! For example: The fairgrounds event center said to hold up to 7K and all from 80 will be directed to drive Douglas thru our neighborhoods thru downtown....why would anyone PLAN that? Had anyone ever gone to the July 4th fireworks and sat in gridlock in all directions trying to exit?

The other is the homeless who are mainly in our old neighborhood. I seem to be in the middle of it - being centered between Roseville Square - Recycle on Douglas - Royer Park - Salvation

Army. I no longer walk alone anywhere (nor go Downtown after dark so I miss your public hearings).

Please do everything you can to protect the current residents in our old historic neighborhood!! Maybe the loft would be better suited off Atlantic where there would be less congested freeway access, and better in/out access?

Well, I tried to keep it short! I have attached a picture for your entertainment of a truck trying to make that turn onto Nevada from Ben Ezra, google directed him here as the traffic was backed up somewhere else!! Thought that would give you a laugh even though it wasn't so funny in my front yard that day.

Thanks for taking the time to read my 2 cents,
Regards,
Judy Fox
200 Nevada





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Driver Carries
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Public Comments: Carol Sutton, 183 Nevada Ave. Roseville Ca. 95678

Date: April 30, 2019

Regarding Infill Project; INFILL PCL 246—Roseville Old Town Lofts, File #PL 18-0178 Nevada Avenue and Douglas Blvd.

As an owner-resident in the Nevada Avenue neighborhood near the proposed project that faces Douglas Boulevard, I have numerous concerns. A sampling of those concerns follows.

1. General Plan Concerns: Does the plan for the **Douglas Blvd corridor provide specific details?** The City developed well-debated and specific plans for **downtown and Vernon Street**. Additionally, a comprehensive, creative plan for improving **Riverside Avenue** was carried out successfully.

It would be negligent, even derelict of City Planners to proceed in this day and age without a comprehensive plan. Prospective development must be compatible with the established, commonly understood vision/plan. Critical decisions and the future of our neighborhoods are jeopardized by a piecemeal approach, and neighbors and affected local businesses placed in a defensive mode as they fight to protect the investments we have made in our community.

Comprehensive planning is **proactive**. Such a plan takes into consideration the views, preferences, and concerns, as well as creative solutions to problems as voiced by owners and renters alike, from Roseville Square occupants to individual households. Undoubtedly the experiences of other communities are given importance, such as transportation planning in Portland, Oregon. Recent projects in Roseville have been successfully executed with such specific and careful planning (Note the Riverside Avenue Improvement Plan). How does the Infill Project meet the Plan for our Douglas Blvd Corridor?

2. Transportation is a major concern in all planning for the City. Future needs would, expectedly, include the following:

A. **Rapid transit** features connect main streets with the Galleria, downtown and the freeway, as well as with Sierra College, downtown Sacramento, Auburn, etc.

B. **Vehicle recharging centers** as well as **communal- use bicycle centers**, city-wide **safe bicycle lanes**, and wide **pedestrian-friendly sidewalks** are stipulated along with **train tracks** and other transit considerations.

C. **AMPLE Parking is provided with ACCESS** to residences and commercial buildings that are both **SAFE** and **convenient** for visitors, private and commercial deliveries, City and County Services, Fire, Emergency Vehicles, Garbage Pick-Ups and US Mail service. Concurrently, if need arises.

D. **SIGNALS, Street lights and roadway markings** facilitate and enhance safe and expedient transportation with clearly-understood street ingress, and sensibly-timed governing traffic lights coordinated to make driving, biking, walking, and rolling safe, obvious, and free of confusion to all users. Consideration of

possible negative impact to the established pathways/flyways of birds, bats, etc. must also be explored.

E. **INTERSECTING or conflicting transportation needs** should be addressed in Transportation Studies done by forward-looking professionals who take into consideration all those varied **intersecting needs**. For example,

- **Do bicycle paths, clearly marked, lead in the legal direction** on a one-way street?

- **Are adequate wheelchair and handicap accesses coupled with unobstructive views** down streets, avenues and boulevards?

- **Are setbacks ample for future projected rapid transit?** Are mandates adequate for new architectural and transit development? e.g., buildings and facilities located clearly away from **projected** bike lanes, train tracks, or streetcar paths?

3. **The proposal for the lofts mirrors the design of a development in Portland**, so it would be prudent to consider the similarities and differences in these locales. Obviously Portland's TriMet with its MAX Light Rail, with electric-powered buses and Streetcar System, WESCommuter railroad, etc. and the ongoing importance given to **planning** its transportation system has reaped rewards in tourism dollars as well providing an environmentally friendly and economically desirable destination. Portland is a good model for any city's development.

When Portland recently received a transit grant from the Federal Government, Portland Transportation Commissioner Chloe Eudaly commented, *"...this grant will help us continue to set an example for the nation in reducing carbon emissions as we grow our economy and address the housing crisis "As we expand public transit and grow the Central City, we will reduce traffic congestion and provide more opportunities for Portlanders to walk, roll, and bike through our public-transit oriented community."*

It would be advantageous for Roseville to learn from Portland and to adapt their experiences and successes into our own Plan. Have we done so?

4. **Comprehensive needs assessment and intelligent planning** pave the way for success, and thereby prevent an understandably hostile reaction to a piecemeal, developer-driven approach marked by costly mistakes—in terms of damage to the environment, lack of appropriate transportation, destruction to smooth-functioning neighborhoods, and esthetically jarring or non-harmonious architecture.

So please, plan to build the infrastructure to attract forward-seeing developers, so that Roseville's residents, workers, and visitors, all might look forward to biking, walking and rolling through our own downtown and Douglas Boulevard corridor.

5. **Environmental concerns are major concerns**. What is Roseville's plan to **reduce carbon emissions**? How are we to increase oxygen-producing vegetation

as well as provide relief from the ever- increasing city and freeway air, polluting noise, and visual pollution?

Hardscape “**water runoff**”, may be a potentially enormous problem in an unpredictable winter (reference the Sacramento Bee’s coverage of potential flooding of the valley floor in **extreme wet weather**). On the other hand, we are encouraged to utilize water-collection facilities in order to prepare for **dry** periods. Both optimal and adequate water storage and flood prevention are increasingly urgent due to changing, unpredictable weather patterns. Are storm drains and water holding facilities adequate?

The **nesting** and **flight patterns** of birds and bats necessitates thoughtful preservation of established trees, structures, and natural vegetation where existing. Have City Planners consulted the experts in these fields regarding the section of the plan that deals with our immediate portion of Douglas Boulevard Corridor development? What is the impact of oak tree removal? The notion of “pay- for- a- substitute- tree (maybe at the park?) may be inconsistent with preservation of this particular habitat.

6. Green Energy/Alternative Energy/ Solar Design. Surely the plan for Roseville’s future development specifies requirements for ecologically sound and aesthetically harmonious design. No new construction should be considered that has not included **exhaustive** measures to ameliorate any present or future negative impact on the environment. No project should be considered unless it ensures that the existing neighborhood **is aesthetically as well as environmentally enhanced**.

IN CONCLUSION, planners should be cautioned against imposing a Lofts-like project existing in Portland (with its well-planned and funded as well as highly-utilized and expanding transit -system and transportation-friendly housing provisions) on a quaint, sleepy neighborhood in Roseville.

As of today, any two adults residing in a neighborhood at any location in Roseville likely possess and park at least two vehicles in their garage, and often with additional vehicles in the driveway or at the curb and a boat or RV parked along side the house. More than two driving-age residents? More than two vehicles.

Additionally, neighboring small businesses cannot be counted upon to “share” their parking spaces. Our experience on Nevada Avenue is that **every single space at the curb is needed** by existing residents due to City-authorized Granny Flats, absence of garages, or several vehicle-owners living at one address, especially when residents are home and businesses are operating. Such existing street curbside parking should not be removed to accommodate new development. Where, logically, would these vehicle owners locate **new parking**?

In what ways will development enhance the neighborhood and ultimately the city?
Jamming twenty-three units with their respective closed, un-shared personal parking garages into an area approximately 9/10 of an acre and without providing ANY, let alone ample, additional parking would be a travesty.

I clearly voice the logic that NO DEVELOPMENT SHOULD PROCEED WITHOUT ROSEVILLE'S PLANNERS' CLEAR DEMONSTRATION OF THE COMPATIBILITY OF ANY GIVEN PROPOSAL WITH A **CURRENT, ENVIRONMENTALLY-FRIENDLY GENERAL PLAN**. MY FEAR IS THAT THE CORRIDOR WITH ITS NEIGHBORHOODS AND COMMERCIAL RESIDENTS JUST MAY BE FUNCTIONING **WITHOUT SUCH A PLAN**. **WHERE IS THE PLAN? Please do not proceed without it.**

Opinion on Proposed 23 unit "Old Town Lofts" at Nevada Ave. and Douglas Blvd.

It is obvious that the city has a great deal invested in this project. This is evidenced by their willingness to offer-up our public right of way by narrowing the width of Nevada Ave. only to benefit the developer. We can only hope to "shape" the outcome in certain key areas.

1. 23 homes add 43% more properties to the 57 total existing properties on Nevada. This would be a significant negative impact on our street density.
2. Three (3) Stories high with patio roof for human activities is not harmonious with bordering property owner's privacy.
3. No consideration for the west Nevada Ave. office complex overspill of parking on Nevada Ave. and the curbside parking along that west side curb.
4. East bound Douglas traffic turning from suicide lane north into proposed site conflicts with Nevada Ave egress traffic onto Douglas. One Way use on Nevada southbound conflicts with the site's egress flow to Nevada Ave. with Wrong Way flow potential for northbound travel into southbound Nevada one Way. Additional "wrong way" signage will be necessary at the north egress/ingress project location to warn motorist not to turn north onto Nevada Ave.!
5. Currently, Nevada one way south is main access onto Douglas and heavily used. It is extremely hazardous to pull out into Douglas east/west traffic. It is often confusing to make a driving decision with respect to the Keehner traffic signal. This Light Signal allows westbound through traffic while at same time creates appearance of stopped traffic at the southbound Keehner turn lane. Nevada intersection sits at a low point with respect to Douglas topography making it hard to judge Douglas down-hill vehicle distance and rate of travel.

Objectives for shaping outcome of project:

Argue for units 1, 2, 10, 9 and 17 (all on the Nevada Ave. side) to be removed from proposal and the internal road access be brought completely within the current site boundaries. Do not give up existing Nevada Ave. road width. Also, eliminate the roof top patio concept from the design.

Argue for city to install a new traffic signal at Nevada Ave. and Douglas, synchronized with the Keehner Ave. traffic signal. This will make access to Douglas Blvd. safer for motorist in our neighborhood and for added pedestrian travel crossing Douglas and Nevada. Citrus Heights City has a prime example of dual synchronized traffic signals at the intersection of Auburn Blvd., Kanai Ave. and Carleton Lane. The two side streets, Kanai and Carleton off busy Auburn Blvd. are nearly identical (75' apart) as Nevada and Keehner at Douglas. Their traffic signals enhance safe motoring and pedestrian foot travel for the local business establishments and serve as a perfect model for the City of Roseville.

General Plan - Looks like the proposal would be in violation of policies in the Land Use Element:

Policy: https://www.roseville.ca.us/UserFiles/Servers/Server_7964838/File/Government/Departments/Development%20Services/Planning/General%20Plan/02_Land_Use_Element%20%20ver.%202017-09.pdf

On Page II-33 "Community Form - Downtown Neighborhoods (DN):

"5. Encourage infill development and rehabilitation that:.... efficiently utilizes and does not overburden existing services and infrastructure; and ...

7. Support the maintenance and rehabilitation of existing residential units within established neighborhoods." *(this development is removing the the existing residential unit on the parcel)*

8. Identify locations where special study is necessary to develop strategies for preserving, enhancing and revitalizing these areas. *(there should be special study completed on Douglas - similar to Riverside, before this project is even considered)"*

In addition, Page II-48 C. Goals and Policies:

This development proposal is violation of Growth management Goal 4: " The City shall continue a comprehensive, logical planning process, rather than an incremental, piecemeal approach."

This is also in violation of Goal 12: The City shall use growth management as a tool to maintain the City's identity, community form, reputation in the region, to maintain high levels of service for residents, and to influence projects outside the City's boundaries that have the potential to affect the quality of life and/or services that are provided to residents."