

May 2023 | Response to Comments
State Clearinghouse No. 2023040021

NEW DISTRICT OFFICE PROJECT

Roseville Joint Union High School District

Prepared for:

Roseville Joint Union High School District

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APPENDICES

Appendix A Mitigation Monitoring and Reporting Program

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1. Introduction

1.1 INTRODUCTION

This document includes a compilation of the public comments received on the New District Office Project Initial Study and Mitigated Negative Declaration (collectively, “MND;” State Clearinghouse No. 2023040021) and the Roseville Joint Union High School District’s (District) responses to the comments.

Under the California Environmental Quality Act (CEQA), a lead agency is not required to prepare formal responses to comments on an MND. However, CEQA requires the District to have adequate information on the record explaining why the comments do not affect the conclusion of the MND that there are no potentially significant environmental effects. In the spirit of public disclosure and engagement, the District—as the lead agency—has responded to all written comments submitted on the MND during the 30-day public review period, which began April 3, 2023 and ended on May 2, 2023.

1.2 DOCUMENT FORMAT

Section 1, *Introduction*. This section describes CEQA requirements and the content of this document.

Section 2, *Response to Comments*. This section provides a list of agencies and persons commenting on the MND, copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a letter. Individual comments for each letter have been numbered, and the letter is followed by responses with references to the corresponding comment number.

Appendix A, *Mitigation Monitoring and Reporting Program*. This document lists all the mitigation measures required for implementation of the project, the phase in which the measures would be implemented, and the enforcement agency responsible for compliance. The monitoring program provides 1) a mechanism for giving the lead agency staff and decision makers feedback on the effectiveness of their actions; 2) a learning opportunity for improved mitigation measures on future projects; and 3) a means of identifying corrective actions, if necessary, before irreversible environmental damage occurs.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (b) outlines parameters for submitting comments on negative declarations, and reminds persons and public agencies that the focus of review and comment of MNDs should be on the proposed findings that the project will not have a significant effect on the environment. If the commenter believes that the project may have a significant effect, they should: (1) Identify the specific effect, (2) Explain why they believe the effect would occur, and (3) Explain why they believe the effect would be significant.

1. Introduction

CEQA Guidelines Section 15204 (c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.”

Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

Finally, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to potentially significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the environmental document.

2. Response to Comments

This section provides all written comments received on the circulated MND and the District's response to each comment.

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the MND are excerpted in this document, they are indented. The following is a list of all comment letters received on the circulated MND during the public review period.

Letter Reference	Commenting Person/Agency	Date of Comment	Page No.
A	Regional Water Quality Control Board, Peter Minkel, Engineering Geologist	May 2, 2023	4

2. Response to Comments

LETTER A – Regional Water Quality Control Board, Peter Minkel. (4 pages)



Central Valley Regional Water Quality Control Board

2 May 2023

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COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, NEW DISTRICT OFFICE PROJECT, SCH#2023040021, PLACER COUNTY

A-1

Pursuant to the State Clearinghouse's 3 April 2023 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Mitigated Negative Declaration* for the New District Office Project, located in Placer County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore, our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

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The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of

MARK BRADFORD, CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley

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Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsir_2018_05.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and

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Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality/certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:
https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:

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CONT'D

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

Peter Minkel

Peter Minkel
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,
Sacramento

2. Response to Comments

A. **Response to Comments from the Regional Water Quality Control Board, Peter Minkel, dated May 2, 2023.**

- A-1 The commenter states that the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the Request for Review for the Mitigated Negative Declaration for the New District Office Project. Additionally, the commenter states that the Central Valley Water Board is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore, their comments will address concerns surrounding those issues.

As this comment does not describe any inadequacies in the CEQA analysis or conclusion in the MND, no changes to the MND are necessary.

- A-2 The commenter summarizes the Central Valley Water Board's regulatory setting and discusses basin plans for all areas within the Central Valley region. The commenter further discusses antidegradation considerations and states that all wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The commenter states that the antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements permitting processes. The commenter also states that the environmental review document should evaluate potential impacts to both surface and groundwater quality.

Section 3.10, Hydrology and Water Quality, beginning on pages 62 of the MND provides information regarding the potential impacts to both surface and groundwater quality.

- A-3 The commenter summarizes the potential permitting requirements for the proposed project, including the Clean Water Act Section 404 Permit, Clean Water Act Section 401 Permit – Water Quality Certification, Waste Discharge Requirements – Discharges to Waters of the State, Dewatering Permit, and Limited Threat General NPDES Permit. For each permit summary, the commenter provides a link where additional information can be obtained.

As this comment does not describe any inadequacies in the CEQA analysis or conclusion in the MND, no changes to the MND are necessary.

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1. Introduction

The Roseville Joint Union High School District (District) intends to construct a new two-story District office to consolidate its administrative functions into a central facility on the existing District property, located at 1750 Cirby Way, in Roseville, California.

1.1 PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

The District is the lead agency for the proposed New District Office Project (proposed project) and has developed this Mitigation Monitoring and Reporting Program (MMRP) as a vehicle for monitoring mitigation measures outlined in the New District Office Project Mitigated Negative Declaration (MND), State Clearinghouse No. 2023040021. As the lead agency, District is responsible for implementing the MMRP, which has been prepared in conformance with Section 21081.6 of the California Public Resources Code:

- (a) When making findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:
 - (1) The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.
 - (2) The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.

The MMRP consists of mitigation measures that avoid, reduce, and/or fully mitigate potential environmental impacts. The mitigation measures have been identified and recommended through preparation of the MND and drafted to meet the requirements of California Public Resources Code, Section 21081.6.

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1.2 PROJECT CHARACTERISTICS

1.2.1 Project Location

The project site is at 1750 Cirby Way in the southeastern portion of Roseville in Placer County, California. Roseville is in the upper Sacramento Valley, about 18 miles northeast of Sacramento. Roseville is bordered by the City of Citrus Heights to the south and the City of Rocklin to the northeast. The Sierra Nevada is about 30 miles to the east.

The approximately 2.5-acre project site is immediately south of Cirby Way. The project site comprises two parcels—Assessor's Parcel Numbers 469-340-010-000 and 469-280-049-000. Regional access to the project site is provided via Interstate (I-) 80. I-80 intersects Roseville from north to south. Local access to the project site is via Cirby Way and Old Auburn Road.

1.2.2 Proposed Improvements

The proposed project involves the construction of a new two-story, 26,526-square-foot District office and demolition of an existing, 7,376 square-foot District office. The new office would allow the District to consolidate its administrative functions into one central facility. Currently, the District staff population on-site is approximately 24 persons. The project would also relocate 28 staff from various other District facilities to the new District office. Staff from other facilities provide special education and educational services. The proposed project would not increase staff in the District because staff would relocate from other locations to the new District office.

The newly constructed District office would provide a board room, restrooms, breakout rooms, conference rooms, offices, space for cubicles, and storage rooms. The footprint of the new District office would increase by 19,150 square feet. The location of the new building would be immediately south of the existing District office. The District office would be designed and constructed as a 37-foot-tall, two-story administration that would serve as District headquarters. Primary entrance to the administrative building would be from the northern side of the building, which faces the parking lot and property entrance/exit.

VEHICULAR ACCESS AND CIRCULATION

Vehicular access for the project site would be provided via Cirby Way. Staff and visitors would continue to use the District office main entrance as well as the parking spaces along the front entrance of the property. The path of travel and access points would change from the existing conditions of the project site as a result of the parking lot configuration. This reconfiguration would occur to accommodate the design and layout of the proposed building and to allow for safe and efficient vehicular circulation. The parking spaces in the western portion of the project site and adjacent to the proposed building would change from diagonal parking spaces to perpendicular parking spaces. Additional parking spaces would be provided in the northeastern portion of the project site on the currently empty grass lot.

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PEDESTRIAN ACCESS AND CIRCULATION

Pedestrian access to the project site would continue to be provided via a public sidewalk along the northern and southern side of Cirby Way as well as along the western and eastern side of Crestmont Avenue; both streets are adjacent to the project site. There is one designated crosswalk near the school property that is east of the project site where Crestmont Avenue meets Cirby Way. There are no designated bike lanes near the school property.

STREET NETWORK, BIKE LANES, AND SIDEWALKS

The following paragraphs provide a brief description of the streets that provide access to the project site, the existing bicycle and pedestrian facilities.

Street Network, Bike Lanes, and Sidewalks

Cirby Way

Cirby Way is a four lane east-west street that extends from I-80 to the west and South Cirby Way to the east. Parking along this street is unavailable due to limited space between the street and sidewalk. Cirby Way has sidewalks along both sides of the street and there are no bike lanes. The speed limit on Cirby Way is 40 miles per hour.

South Cirby Way

South Cirby Way is a four lane east-west street that extends from Cirby Way to the west and Old Auburn Road to the east. Cirby Way has sidewalks along both sides of the street with designated bike lanes. The speed limit on South Cirby Way is 40 miles per hour.

Old Auburn Road

Old Auburn Road is a two lane east-west street that extends from Sunrise Boulevard to the west and Sierra College Boulevard to the east; Old Auburn Boulevard meets South Cirby Way at a “T” intersection with traffic signals present. There are two painted white crosswalks at this intersection. Old Auburn Road has sidewalks along both sides of the street with designated bike lanes. Parking is also available along portions of this road. The speed limit on Old Auburn Road is 45 miles per hour, east of the “T” intersection, and 40 miles per hour, south of the “T” intersection.

PARKING

The main parking area for staff, personnel, and visitors would be in the existing parking lot, near the front entrance, as well as behind the District office, near the Oakmont High School Stadium entrance and concessions building. Currently, there is a total of 506 parking spaces, which includes parking for both the District office and high school; there is a total of two handicap parking spaces behind the existing District office. The parking lot would be reconfigured to accommodate the new District office and improve vehicle circulation and pedestrian safety.

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The proposed parking lot layout would improve circulation by adding new parking spaces in the northeastern portion of the project site where an empty grass lot currently exists. This area would accommodate a total of 24 new parking spaces. In total, the proposed parking lot layout would include 472 parking spaces for both the District office and high school; this equates to a reduction of 34 parking spaces. There would be a total of five handicap parking spaces in the front entrance of the proposed District office. These five handicap parking spaces would provide safe and convenient access as they are situated near the proposed building and are easily accessible via a proposed ADA-compliant sidewalk ramp.

Other parking would continue to be provided outside of the project boundaries in the primary entrance of the high school, to the west and south of the project site. Additional landscaping with curbs would be installed along the western perimeter of the project site to enclose the parking lot and establish a barrier from the primary high school entrance/exit.

PROJECT PHASING AND CONSTRUCTION

Project development is anticipated to be completed in one phase, including demolition of the existing District office, site preparation, grading and excavation, trenching for site utilities, construction of the new District office, paving, and painting. Overall construction is estimated to take approximately 18 months, from June 2023 to November 2024. The existing District office will remain operational during construction of the new District office. The newly constructed District office would be fully constructed and operational in September 2024. At this stage, staff will move into the new District office and the existing District office will be demolished. From September to November 2024, the parking lot will be constructed.

The project would require approximately 2,000 cubic yards (cy) of cut and approximately 1,800 cy of fill. This could result in approximately 200 cy of soil exported; no soil would be imported. Based on the proposed construction timeline, it is anticipated that the new District office would be operational in September 2024 and the project would be fully complete in November 2024.

1.3 ENVIRONMENTAL IMPACTS

1.3.1 Impacts Considered Less Than Significant

The MND and supporting Initial Study identified various thresholds from the CEQA Guidelines in a number of environmental categories that would not be significantly impacted by the proposed project and therefore did not require mitigation. Impacts to the following environmental resources were found to be less than significant:

- | | |
|---------------------------------------|------------------------------------|
| 1. Aesthetics | 7. Hazards and Hazardous Materials |
| 2. Agriculture and Forestry Resources | 8. Land Use and Planning |
| 3. Air Quality | 9. Mineral Resources |
| 4. Energy | 10. Noise |
| 5. Geology and Soils | 11. Population and Housing |
| 6. Greenhouse Gas Emissions | 12. Public Services |

1. Introduction

13. Recreation

16. Utilities and Service Systems

14. Transportation

17. Wildfire

15. Tribal Cultural Resources

1.3.2 Potentially Significant Adverse Impacts That Can Be Mitigated, Avoided, or Substantially Lessened

Biological Resources, Cultural Resources, Noise, and Tribal Cultural Resources were identified as having potentially significant impacts that could be reduced, avoided, or substantially lessened through implementation of mitigation measures. No significant and unavoidable impacts were identified.

1. Introduction

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2. Mitigation Monitoring Process

2.1 MITIGATION MONITORING PROGRAM ORGANIZATION

Overall MMRP management is the responsibility of the District. The District's technical consultants (CEQA consultant, archaeologist, paleontologist, etc.) may perform related monitoring tasks under the direction of the environmental monitor (if they are contracted by the District).

2.2 ROSEVILLE JOINT UNION HIGH SCHOOL DISTRICT

The District is the designated lead agency for the MMRP and has the overall responsibility for the review of all monitoring reports, enforcement actions, and document disposition. The District will rely on information provided by individual monitors (e.g., CEQA consultant, archaeologist, paleontologist), presuming it to be accurate and up to date, and will field check mitigation measure status, as required.

2.3 MITIGATION MONITORING TEAM

The mitigation monitoring team, including the construction manager and technical advisors, is responsible for monitoring implementation/compliance with all adopted mitigation measures and conditions of approval. A major portion of the team's work is field monitoring and compliance report preparation. Implementation disputes are brought to the District's Director of Facilities Development and/or their designee.

2.3.1 Monitoring Team

The following summarizes key positions in the MMRP and their functions:

1. **Construction Manager:** Responsible for coordination of mitigation monitoring team; technical consultants; report preparation; and implementing the monitoring program, including overall program administration, document/report clearinghouse, and first phase of dispute resolution.
2. **Technical Advisors:** Responsible for monitoring in their areas of expertise (CEQA, archaeology, paleontology). Report directly to the monitoring program manager.

2.3.2 Recognized Experts

Recognized experts are required on the monitoring team to ensure compliance with scientific and engineering mitigation measures. The mitigation monitoring team's recognized experts will assess compliance with required mitigation measures, and recognized experts from responsible agencies will consult with the construction manager regarding disputes.

2. Mitigation Monitoring Process

2.4 ARBITRATION RESOLUTION

If a mitigation monitor is of the opinion that a mitigation measure has not been implemented or has not been implemented correctly, the problem will be brought before the construction manager for resolution. The decision of the construction manager is final unless appealed to the District's Director of Facilities Development and/or their designee. The construction manager will have the authority to issue stop work orders until the dispute is resolved.

2.5 ENFORCEMENT

Agencies may enforce conditions of approval through their existing police power using stop work orders; fines; infraction citations; or in some cases, notice of violation for tax purposes.

3. Mitigation Monitoring Requirements

3.1 PRE-MONITORING MEETING

A pre-monitoring meeting will be scheduled to review mitigation measures, implementation requirements, schedule conformance, and monitoring team responsibilities. Team rules will be established, the entire mitigation monitoring program presented, and any misunderstandings resolved.

3.2 CATEGORIZED MITIGATION MEASURES/TABLE

Project-specific mitigation measures have been categorized in Table 3-1, *Mitigation Monitoring Requirements*. The table identifies the environmental impact, specific mitigation measures, schedule, and responsible monitor. The mitigation table will serve as the basis for scheduling the implementation of and compliance with all mitigation measures.

3.3 FIELD MONITORING

Project monitors and technical subconsultants shall exercise caution and professional practices at all times when monitoring implementation of mitigation measures. Protective wear (e.g., hard hat, glasses) shall be worn at all times in construction areas. Injuries shall be immediately reported to the mitigation monitoring team.

3.4 COORDINATION WITH CONTRACTORS

The construction manager is responsible for coordination of contractors and for contractor completion of required mitigation measures.

3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
BIOLOGICAL RESOURCES				
BIO-1 Conduct a pre-construction nesting raptor and bird survey of all suitable habitat on the project site within 14 days of the commencement ground disturbance (e.g., tree/vegetation removal, mass grading) during the nesting season (February 1 – August 31). Where accessible, surveys should be conducted within 300 feet of the project site for nesting raptors, and 100 feet of the project site for other nesting birds.	Qualified biologist	Within 14 days of ground disturbing construction activities	Roseville Joint Union High School District	
BIO-2 If active nests are found, a no-disturbance buffer around the nest shall be established. The buffer distance shall be established by a qualified biologist, in consultation with CDFW. The buffer shall be maintained until the fledglings are capable of flight and become independent of the nest tree, to be determined by a qualified biologist. Once the young are independent of the nest, no further measures are necessary.	Qualified biologist	Within 14 days of ground disturbing construction activities	Roseville Joint Union High School District	
Cultural Resources				
<p>CUL-1 Prior to ground disturbance by project site clearance and grading, the District shall retain a qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist, to be on-call during all project ground disturbance activities.</p> <p>If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for precontact and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:</p> <ul style="list-style-type: none"> ▪ If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required. ▪ If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify the CEQA lead agency, and applicable landowner. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the NRHP or CRHR. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not eligible for the 	Qualified professional archaeologist	Prior to ground disturbing construction activities by clearance and grading	Roseville Joint Union High School District	

3. Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>NRHP or CRHR; or 2) that the treatment measures have been completed to their satisfaction.</p> <ul style="list-style-type: none"> If the find includes human remains, or remains that are potentially human, he or she shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the Placer County Coroner (as per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the Native American Heritage Commission (NAHC), which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the District does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the PRC). If no agreement is reached, the District must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate information center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction. 				
Noise				
<p>NOI-1 Mechanical equipment shall be selected and designed to meet the City's noise limits of 50 dBA Leq and 45 dBA Leq at residential uses during daytime and nighttime, respectively. A qualified acoustical consultant shall be retained to assist in selecting and reviewing mechanical noise specification to confirm noise code compliance. Noise reduction measures could include, but are not limited to:</p> <ul style="list-style-type: none"> Selection of equipment that emits noise levels of 45 dBA or less at a distance of 50 feet. Installation of noise-dampening techniques, such as enclosures and parapet walls, to block the line-of-sight between the noise source and the nearest receptors to reduce noise levels to 45 dBA or less. 	Qualified acoustical consultant	Prior to construction /During any ground- disturbing construction activities	Roseville Joint Union High School District	

3. Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>NOI-2 Vibratory compaction for paving within 25 feet of any surrounding residential structure shall use a static roller in lieu of a vibratory roller. At a distance greater than 25 feet, a vibratory roller would not exceed 0.20 in/sec PPV and is allowed for use.</p> <p>Grading, earthwork, and demolitions activities within 15 feet of adjacent residential structures shall be conducted with off-road equipment that is limited to 100 horsepower or less.</p>	Qualified acoustical consultant	Prior to construction /During any ground- disturbing construction activities	Roseville Joint Union High School District	
Tribal Cultural Resources				
<p>TRI-1 If any suspected TCRs are discovered during ground disturbing construction activities, all work shall cease within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. A Tribal Representative from a California Native American tribe that is traditionally and culturally affiliated with a geographic area shall be immediately notified and shall determine if the find is a TCR (PRC §21074). The Tribal Representative will make recommendations for further evaluation and treatment as necessary.</p> <p>When avoidance is infeasible, preservation in place is the preferred option for mitigation of TCRs under CEQA and tribal protocols, and every effort shall be made to preserve the resources in place, including through project redesign, if feasible. Culturally appropriate treatment may be, but is not limited to, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, or returning objects to a location within the project area where they will not be subject to future impacts. Permanent curation of TCRs will not take place unless approved in writing by the California Native American tribe that is traditionally and culturally affiliated with the project area.</p> <p>The contractor shall implement any measures deemed by the CEQA lead agency to be necessary and feasible to preserve in place, avoid, or minimize impacts to the resource, including, but not limited to, facilitating the appropriate tribal treatment of the find, as necessary. Treatment that preserves or restores the cultural character and integrity of a TCR may include Tribal Monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil.</p> <p>Work at the discovery location cannot resume until all necessary investigation and evaluation of the discovery under the requirements of the CEQA, including AB 52, have been satisfied.</p>	Tribal representative	During any ground- disturbing construction activities	Roseville Joint Union High School District	

3. Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>CUL-1 Prior to ground disturbance by project site clearance and grading, the District shall retain a qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist, to be on-call during all project ground disturbance activities.</p> <p>If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for precontact and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:</p> <ul style="list-style-type: none"> ▪ If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required. ▪ If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify the CEQA lead agency, and applicable landowner. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the NRHP or CRHR. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not eligible for the NRHP or CRHR; or 2) that the treatment measures have been completed to their satisfaction. <p>If the find includes human remains, or remains that are potentially human, he or she shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the Placer County Coroner (as per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the Native American Heritage Commission (NAHC), which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the District does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the PRC). If no agreement is reached, the District</p>	<p>Qualified professional archaeologist</p>	<p>Prior to ground disturbing construction activities by clearance and grading</p>	<p>Roseville Joint Union High School District</p>	

3. Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate information center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.				

4. Mitigation Monitoring Reports

Mitigation monitoring reports are required to document compliance with the Mitigation Monitoring Program and to dispute arbitration enforcement resolution. Specific reports include:

- Field Check Report
- Implementation Compliance Report
- Arbitration/Enforcement Report

4.1 FIELD CHECK REPORT

Field check reports are required to record in-field compliance and conditions.

4.2 IMPLEMENTATION COMPLIANCE REPORT

The Implementation Compliance Report is prepared to document the implementation of mitigation measures, based on the information in Table 3-1. The report summarizes implementation compliance, including mitigation measures, date completed, and monitor's signature.

4.3 ARBITRATION/ENFORCEMENT REPORT

The Arbitration/Enforcement Report is prepared to document the outcome of arbitration review and becomes a portion of the Implementation Compliance Report.

4. Mitigation Monitoring Reports

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5. Community Involvement

Monitoring reports are public documents and are available for review by the general public. Discrepancies in monitoring reports can be taken to the District's Director of Facilities Development and/or their designee by the general public.

5. Community Involvement

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6. Report Preparation

6.1 LIST OF PREPARERS

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6. Report Preparation

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