Date: November 13, 2013

To: Planning Commission Chair Gordon Hinkle and members of the Planning Commission

Cc: Ron Miller, City of Roseville Associate Planner

Subject: Proposed West Roseville Specific Plan Amendment

(WRSP -SPA-3) for the Fiddyment Farm area

Dear Chair Hinkle and Planning Commission members,

The WestPark – Fiddyment Farm Neighborhood Association (WFFNA) has submitted numerous correspondence of opposition to the proposed SPA-3 plan, both the original proposal of over 1,900 units, and the more recent proposal of 1,661 units. Once again, we ask your consideration to not approve SPA-3 as currently proposed.

The notification dated March 7, 2013, from Ron Miller, City of Roseville Associate Planner, discusses reactivating SPA-3 with a proposed lower figure. The notification contains numerous discrepancies and omissions in the figures represented for SPA-3. It fails to take into consideration prior amendment requests for the WestPark area of the WRSP, and the quantities noted on numerous figures do not total up correctly. More accurate figures for both areas are reflected on the two documents attached—Table 1: WestPark – Cumulative Totals and Table 2: Fiddyment Farm – Cumulative Totals. Both of these documents indicate cumulative figures supplied by the developers for pending amendments and, with minor changes made during previous construction, should be fairly representative of the state of the WRSP to date.

As the figures in attached Table A represents, including the current pending amendment to the Phase 4 area (which WFFNA does not object to), the projected numbers of units for the WestPark area would increase from the original 4,260 units to approximately 4,610 units. However, as the attached Table B represents, the Fiddyment Farm totals, including the current proposed SPA-3, would jump significantly from the original 4,170 units to 5,868 units.

The West Roseville Specific Plan, adopted in 2004, Sec. 4.3 of the Land Use Plan specifies:

"The West Roseville Specific Plan has assigned residential densities based on a plan level assessment of the constraints and opportunities of each large-lot Specific Plan parcel and anticipated long-term demand for various housing types. ...It is anticipated that this process may result in the desire or need to adjust (reduce or increase) the number of units assigned to some large-lot residential parcels.

"It is the intent of the WRSP to permit flexibility in adjusting the number of residential units allocated to any residential large lot parcel in response to market demand, subdivision and/or design review considerations, including but not limited to transfers which do not result in additional impacts to oak trees or other natural resources. To further this intent, units may be transferred between large lot residential parcels provided:

"b. The cumulative increase or decrease in units resulting from the minor density adjustment does not change by more than twenty-percent (20%) the number of pretransfer units allocated to either the transfer or receiving parcel as established at the time of original approval of the Specific Plan."

It appears the obvious intent of the West Roseville Specific Plan is to maintain the development within a reasonable limit of the original approved allotments—20% as named. As the following figures indicate, SPA-3 is far beyond the intent of the West Roseville Specific Plan.

Area	WRSP Original	With Pending	Cumulative	% Increase-
	Units	SPAS	Increase	Area
WestPark	4,260	4,610	350 units	8%
Fiddyment Farm	4,170	5,868	1,698 units	40.7%

Total WRSP Original	20% Cumulative Limit	Cumulative Increase of	Total % Proposed
Approved	of original WRSP	Proposed SPAs	Increase to WRSP
8,430 Units	1,686 Units	2,048 Units	24.3%

As stated in the WRSP introduction, "The West Roseville Specific Plan is the primary land use, policy and regulatory document used to guide development of the project area. ...All subsequent development projects and related activities in the WRSP area are required to be consistent with this Specific Plan." Residents of the WestPark and Fiddyment Farm developments purchased their homes under the guidelines of the WRSP and signed agreements for the Mello Roos assessments attached thereto. Those assessments are supposedly apportioned with the figures consistent with the original WRSP. Even though there have been minor increases to the amount of units so far, there have been no proposed equivalent adjustments to reduce the matching assessments proportionally yet.

The homeowners of the WRSP area ask that the City Council reject the proposed Specific Plan Amendment pending for the Fiddyment Farm area (SPA-3) as currently proposed. We would ask that any further amendment be limited within the original scope of the WRSP and held within the 20% cumulative total originally authorized in the Plan. Although the Plan does not specify that the 20% be maintained by any subdivision, it does specify, "The intent is to promote the systematic and orderly development of the Plan Area." There is a vast discrepancy between the **40.7%** (1,661 units) increase SPA-3 proposes and what 20% of the total Fiddyment Farm increase would be (834 units), some of which have already been used in prior amendments. Such a huge density increase is not consistent with maintaining a consistent balance within the Fiddyment Farm area.

We have no opposition to the minor changes proposed SPA for Phase 4 of the WestPark area, and would include those figures in the overall cumulative limits of the WRSP. Thus, we would ask that any further amendment requests for the WRSP be limited as follows:

Total WRSP	20% Cumulative	Current Projected	Current	Cumulative
Original Approved	Limit of WRSP	WestPark totals	Fiddyment Farm	balance not to
				exceed
8,430 Units	10,116 Units	4,610 Units	4,207	1,299 Units

SPA-3 was first submitted back in 2010 requesting the addition of 1,905 units, and was resubmitted in 2012 with a reduction to 1,661 units. This figure is still too high. If even the full cumulative balance of 1,299 units were approved for SPA-3, that increase would represent a 31% increase to the Fiddyment Farm area, and more particularly that would squeeze the density into the last remaining phases, far exceeding the original density of that region. It also incorporates potential allotments from the WestPark area not already used and squeezes them into the Fiddyment Farm area.

The proposed cumulative balance allowed for Fiddyment Farm would keep the SPA-3 area closer to 834 units represented by a 20% increase as approved in the WRSP. However, we are asking only that the SPA-3 area be kept to the density limits and number of units of the original WRSP plan for the area (1,460 units) plus 20% (292 units)—that being a total of 1,752 units, not the proposed SPA-3 total of 3,121 (1,661 additional units).

As for the addition of two more HDR facilities into the Fiddyment Farm area, we would point out that the WRSP already has a large quantity of HDR parcels in the current plan: 3 parcels now planned in WestPark; and 7 parcels in the current Fiddyment Farm area plan for a total of 10 HDR parcels (1,983 units). We can understand that the City of Roseville must meet certain governmental requirements to meet multi-dwelling and affordable housing units. However, those regulations do not dictate that all the requirements be met in the West Roseville area; that is a preference the City of Roseville has taken to simplify its planning processes. Other developments already approved in the West Roseville area are proposed at sufficient densities to accommodate any governmental requirements:

Project (initial proposals)	Total Acres	LDR Units	MDR Units	HDR Units	Total Units
Sierra Vista (approved)	2064	2,531	2,214	1,650 (8 parcels)	6,650
Westbrook (approved)	397.4	705	635	689 (4 parcels)	2,029
Creekview (approved)	501.3	836	655	520 (3 parcels)	2,011
Amoruso Ranch (pending)		1,132	779	760 (3 parcels)	2,671
Placer Ranch (not annexed yet)	2,200				5,000 + campus for 25,000 full- time students

Members of the WFFNA have met several times with representatives of the proposed SPA-3 amendment. While we approve of some of the suggested infrastructure changes of the general layout, we continue to express our opposition to the extreme increased density as currently proposed.

The residents of the WestPark and Fiddyment Farm neighborhoods respectfully submit this request for the City Council and Planning Department staff to consider the original intent of the WRSP which established the expectations under which we purchased our homes and signed our assessment agreements. To approve SPA-3 as submitted would represent a gross breach of faith with our residents.

Respectfully submitted,
WestPark – Fiddyment Farm Neighborhood Association (WFFNA) Board Members:

Loren Cook, President Robert Gorman, Vice President Sue Hallahan-Cook, Secretary Joe Van Zant, Treasurer Jason Jasmine, Member at Large Lita Freeman, Member at Large

		TABLE 1:	WESTPA	RK - CL	JMULATIVE	TOTALS			
Parcel	Land Use	2006 Units	2009 Changes	# Units	As of 10/2011	# Units	2012	2013 Changes	# Units
W-1-Club	LDR	404							404
W-2-Club	LDR	300							300
W-3	LDR	198							198
W-4	LDR	147							147
W-5	LDR	88							88
W-6	LDR	77							77
W-7	LDR	111							111
W-8	LDR	168							168
W-9	LDR	95	see 17C & 18C						N/A
W-10	LDR	245							245
W-11	LDR	130							130
W-12	LDR	78							78
W-13	LDR	60	W-13C		W-13	309			309
			W-13B		see W-13				N/A
W-14	LDR	115	W-13A		see W-13				N/A
W-15	LDR	80	W-15A		W-15	224			224
			W-15B		see W-15				N/A
W-16	MDR	160	W-16 HDR	208		250 @20.5	5		250
W-17	LDR	210	W-17A			132		W-17A	66
			W-17 B			130		W-17B	56
			W-17C			113		W-17C	69
								W-17D	53
								W-17E	41
W-18	LDR	268	W-18A			141		W-18A	86
			W-18B			152		W-18B	57
			W-18C			112		W-18C	102
								W-18D	92
								W-18E	52
								W-18F	19
W-19	MDR	165	W-19 HDR			252 @ 17.	7	W-19A LDR	109
								W-19B LDR	85
W-20	LDR	0							0
W-21?	was in W-	-18B						W-21? HDR	170 @ 21.
W-28	HDR	175 @ 19.4	see W-18						N/A
W-29	HDR-SR	150 @ 18.8	see 15B?						N/A
Village Co	enter				Redrawn				
W-21	MDR	138							138
W-22	MDR	138					subdivide		138
W-24	MDR	115				111			111
W-25	HDR	240 @ 19.4		232		232	subdivide		232
W-26	HDR	165 @ 16.5							165
W-32	CC-VC	20							20
W-33	CC-VC	20							20
						VC= 824		Add 107 LDR?	
Totals		4,260				4,585			4,610

TABLE 2: FIDDYMENT FARM - CUMULATIVE TOTALS

Parcel		2006 Units	2010 changes	SPA-3	Land Use		
Phase 1	Laria OSE	2000 Offics	2010 Changes	21 ∀ -2	Land Ose	# Offics	
F-1A	LDR	93					
F-1A F-1B	LDR	83					
F-2	LDR	127					
F-3		135					
F-4	LDR LDR	77					
F- 4 F-5							
Total:	LDR	157				672	
Phase 2	9. 2	673				673	
		107	140	F CA	LDD	155	
F-6	LDR	187	140	F-6A	LDR	155	
				F-6B	HDR	195	
				F-6C	MDR	300	
	1.55	444	07	F-6D	CC	445	
F-7	LDR	111	87		LIDE	115	
F-8	LDR	91	/4	F-8A	HDR	277	
				F-8B	MDR	127	
				F-8C	LDR	83	
				F-8D	LDR	35	
F-9	LDR	307	378	F-9A	LDR	108	
				F-9B	LDR	96	
				F-9C	LDR	107	
				F-9D	LDR	35	
F-10	LDR	227	183	F-10A	LDR	122	
				F-10B	LDR	118	
				F-10C	LDR	90	
F-11	LDR	99	84	F-11A	LDR	172	
				F-11B	MDR	182	
F-12	LDR	167	117			113	
F-13	LDR	154	121	F-13A	LDR	90	
				F-13B	LDR	159	
F-14	LDR	422	422			422	
F-15A	LDR	79	76			76	
F-15B&C	MDR	206	F-15B = 45			45	
			F-15C= 46			46	
F-16	MDR		LDLR= 110			110	
F-17	MDR	131	131			131	
F-19	LDR	104	104	F-19A	LDR	135	
				F-19B	LDR	135	
F-20	HDR	120 @ 17.4	156 @ 22.5			156	
F21	HDR	219 @ 15.1	289 @ 20.0			289	
F-22	HDR	126 @ 13.0	207 @ 20.0			207	
F-23	HDR	160 @ 13.2	234 @ 20.0			234	
F-24	HDR	200 @ 15.7	253 @ 20.0			253	
F-25	HDR	90 @ 15.5	137 @ 25.0			137	
F-26	HDR	90 @ 15.3	140 @ 25.0			140	
Total Unit	ts	4170	4207			5868	