

# **Appendix A**

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**Notice of Preparation and Comments**



**COMMUNITY DEVELOPMENT/RESOURCE AGENCY  
ENVIRONMENTAL COORDINATION SERVICES**  
County of Placer

**DATE:** November 3, 2016

**TO:** California State Clearinghouse  
Responsible and Trustee Agencies  
Interested Parties and Organizations

**SUBJECT:** Notice of Preparation of a Draft Environmental Impact Report for the Proposed Sunset Area Plan/Placer Ranch Specific Plan Project

**REVIEW PERIOD:** November 4, 2016 to December 16, 2016

Placer County is proposing to update the Sunset Industrial Area Plan, which includes the proposed Placer Ranch Specific Plan. The County will prepare an environmental impact report (EIR) for the project to satisfy the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and will serve as the lead agency for CEQA compliance. This notice meets the CEQA noticing requirements for a Notice of Preparation (NOP) to provide responsible agencies and interested persons with sufficient information to make meaningful responses as to the scope and content of the EIR. Your timely comments will ensure an appropriate level of environmental review for the project.

**Project Description:** The proposed Sunset Area Plan is a Placer County-initiated update to its 1997 Sunset Industrial Area Plan. The Placer Ranch Specific Plan (PRSP) is included as part of the proposed Sunset Area Plan. This effort would update the existing community plan, general plan, maps, and regulations. The Sunset Industrial Area, which includes the Placer Ranch Specific Plan (PRSP) project site, encompasses 8,358 acres located in unincorporated south Placer County. The County will prepare an environmental impact report (EIR) for the project to satisfy the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and will serve as the lead agency for CEQA compliance. The EIR will analyze the overall Sunset Industrial Area at a program level, and provide a more detailed project-level analysis for the Placer Ranch Specific Plan.

The Sunset Area Plan will bring forward new land use designations, including: General Commercial, Entertainment/Mixed Use; Business Park; Innovation Center; Eco-Industrial; Light Industrial; Public Facility; and Urban Reserve. The 2,213-acre Placer Ranch Specific Plan (PRSP) is a mixed-use community proposed in the Sunset Area Plan consisting of 5,827 residential units including a 720-unit age-restricted community; an elementary school, middle school, 323.5 acres of neighborhood parks and open space; and 6,356,800 square feet of general commercial, commercial mixed use, and campus park (office, research and development, light industrial, and commercial) uses complementary to the university. The proposed university and non-residential land uses of the project are intended as a catalyst for employment-generating development in Placer County's overall Sunset Area.

**Project Location:** The Sunset Industrial Area, which includes the Placer Ranch Specific Plan project site, encompasses 8,900 acres located in unincorporated southern Placer County. Southern Placer County is characterized by a mix of urban, suburban, and rural land uses and is influenced by the Sacramento metropolitan area. The Sunset Industrial Area covers 13.9 square miles between the cities of Rocklin to the east, Roseville to the south, Lincoln to the north, and unincorporated Placer County to the west. The area to the west is primarily farmland. Major landforms in the area include the Sierra Nevada to the east and Folsom Lake to the southeast. The Sunset Industrial Area is located west of State Route 65 which connects to Interstate 80 in the south and State Route 99 to the north. The Sunset Industrial Area is approximately 16 miles from downtown Sacramento.

The proposed Placer Ranch Specific Plan area includes 2,213 acres in the southern portion of the Sunset Industrial Area. The southern boundary of the Placer Ranch Specific Plan area is contiguous with the existing Roseville City limits, and the northern boundary is defined, in part, by the existing alignment of West Sunset Boulevard west of Fiddymont Road.

For more information regarding the project, please contact Sherri Conway, at (530) 745-3031. A copy of the NOP is available for review at the Roseville Public Library, the Rocklin Public Library, the Lincoln Public Library, the Placer County Community Development Resource Agency (Auburn), and on the Placer County website:

<http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir>

**NOP Scoping Meeting:** In addition to the opportunity to submit written comments, two public scoping meetings will be held by the County to inform interested parties about the proposed project, and to provide agencies and the public with an opportunity to provide comments on the scope and content of the EIR. The meetings will be held on Tuesday, November 29, 2016 from 3:00-5:00 p.m. and from 6:00-8:00 p.m. at Western Placer Waste Management Authority Materials Recovery Facility, 3033 Fiddymont Road, Roseville, CA 95747

**NOP Comment Period:** Written comments should be submitted at the earliest possible date, but not later than 5:00 p.m. on **December 16, 2016** to Shirlee Herrington, Environmental Coordination Services, Community Development Resource Agency, 3091 County Center Drive, Suite 190, Auburn, CA 95603. (530) 745-3132, Fax: (530) 745-3080, [cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov).

# NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT

**Date:** November 3, 2016  
**To:** Agencies and Interested Parties  
**From:** Placer County  
**Subject:** Notice of Preparation of a Draft Environmental Impact Report for the Proposed Sunset Area Plan/Placer Ranch Specific Plan Project  
**Review Period:** November 4, 2016 to December 16, 2016

Placer County (County) is proposing to update the Sunset Industrial Area (SIA) Plan (now being named the Sunset Area Plan as part of the update), which includes the proposed Placer Ranch Specific Plan. A summary of the project is provided below. The County will prepare an environmental impact report (EIR) for the project to satisfy the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and will serve as the lead agency for CEQA compliance. The EIR will analyze the overall Sunset Industrial Area at a program level, and provide a more detailed project-level analysis for the Placer Ranch Specific Plan.

## PURPOSE OF THIS NOTICE OF PREPARATION

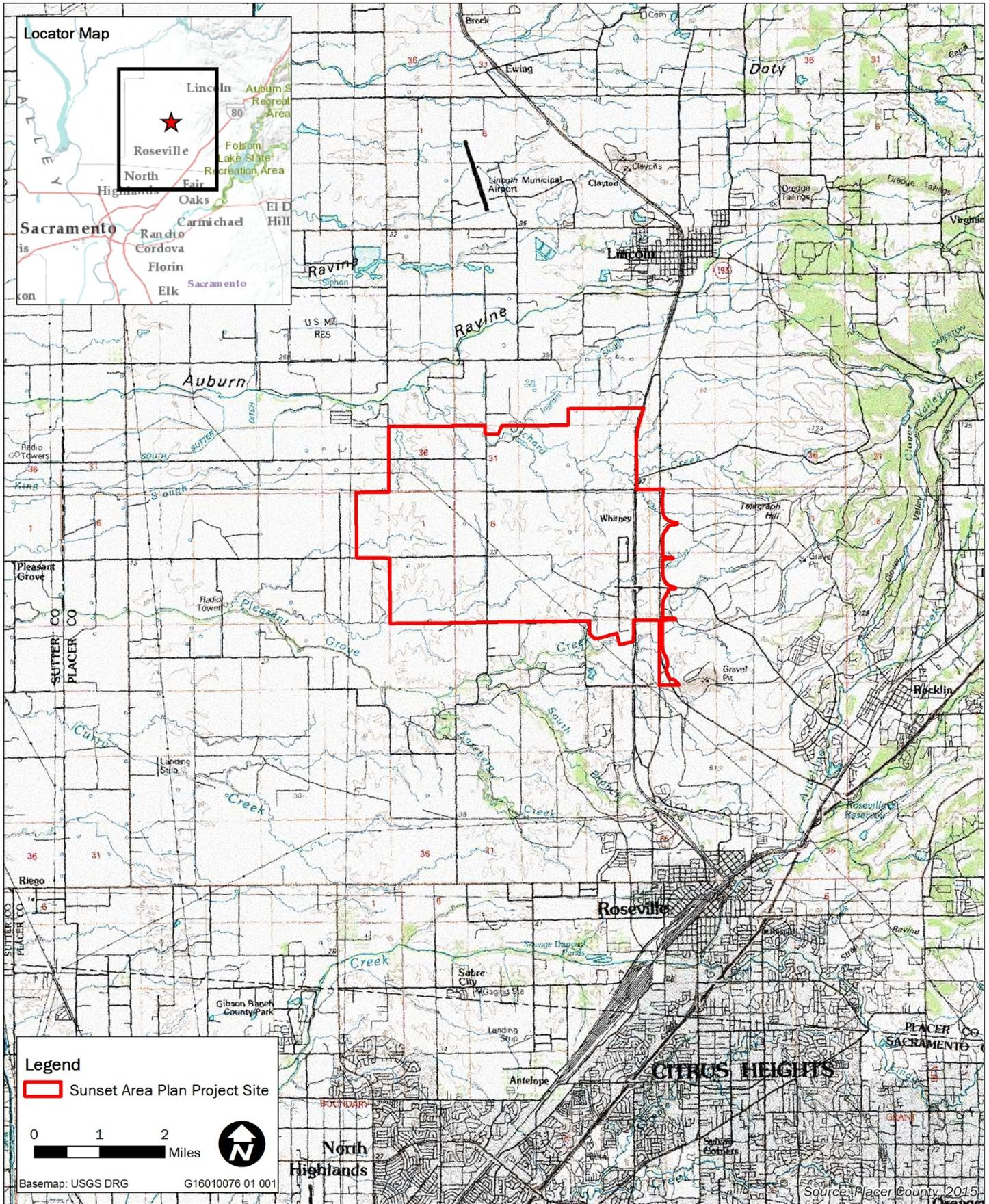
In accordance with the State CEQA Guidelines (14 California Code of Regulations [CCR] Section 15082), the County has prepared this notice of preparation (NOP) to inform agencies and interested parties that an EIR will be prepared for the above-referenced project. The purpose of an NOP is to provide sufficient information about the proposed project and its potential environmental impacts to allow agencies and interested parties the opportunity to provide a meaningful response related to the scope and content of the EIR, including mitigation measures that should be considered and alternatives that should be addressed (State CEQA Guidelines 14 CCR Section 15082[b]).

The project location, description, and potential environmental effects are summarized below.

## PROJECT LOCATION

The Sunset Industrial Area, which includes the Placer Ranch Specific Plan (PRSP) project site, encompasses 8,358 acres located in unincorporated south Placer County (see Exhibit 1). South Placer County is characterized by a mix of urban, suburban, and rural land uses and is influenced by the Sacramento Metropolitan Area. The plan area covers 13.9 square miles between the cities of Rocklin to the east, Roseville to the south, Lincoln to the north, and unincorporated Placer County to the west. The area to the west of the plan area is primarily farmland. Major landforms in the area include the Sierra Nevada to the east and Folsom Lake to the southeast. The plan area is located west of State Route (SR) 65 which connects to Interstate 80 in the south and SR 99 to the north. The plan area is approximately 25 miles from downtown Sacramento.

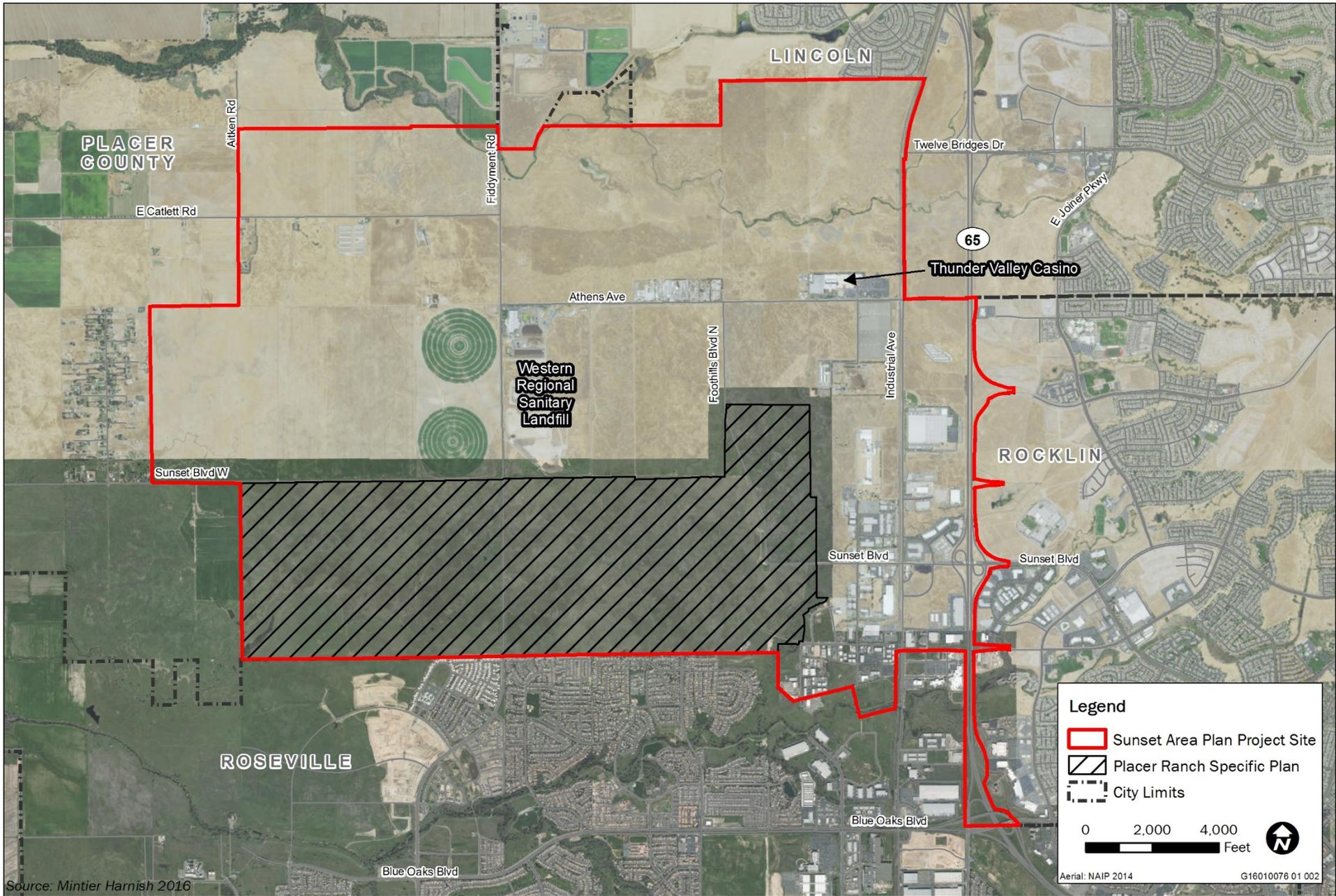
The proposed PRSP area includes 2,213 acres in the southern portion of the Sunset Area Plan. The southern boundary of the PRSP area is contiguous with the existing Roseville City limits, and the northern boundary is defined, in part, by the existing alignment of Sunset Boulevard west of Fiddyment Road (see Exhibit 2).



**Exhibit 1**

**Project Site**





Source: Mintier Harnish 2016

## PROJECT BACKGROUND

### Sunset Industrial Area Plan

An area plan is a supplement to a general plan that provides additional policies and programs for a sub region within the general plan planning area. Every county and city in California is required by State law to prepare and maintain a general plan. A general plan serves as the jurisdiction's "constitution" or "blueprint" for future decisions concerning land use and resource conservation. All specific plans, subdivisions, public works projects, and zoning decisions must be consistent with the local jurisdiction's general plan. An area plan addresses many of the same topics as a general plan, but an area plan focuses on a specific area, while the general plan considers the entire city or county. An area plan augments the goals and policies of the general plan for a specific region. Communities use area plans to comprehensively address issues and opportunities associated within distinct areas.

The current SIA Plan was adopted by the Placer County Board of Supervisors in 1997. At that time, the County envisioned the area as a job center that would provide regional benefit and create primary-wage earner jobs for residents of local cities and unincorporated areas. The plan recognized that the plan area was large and absorption would likely be slow. However, a key strategic goal was to preserve an area for opportunities that would not be precluded due to residential encroachment. That vision has not yet been realized, with almost 90 percent of the area remaining undeveloped. Generally, development has been variable since the SIA Plan was adopted, resulting in a patchwork pattern of sometimes incongruous uses and buildings. The most recent recession resulted in higher vacancy rates within industrial complexes within the plan area.

There have, however, been some business expansions and new development activity during this time within the plan area. The Thunder Valley Casino Resort, located at the intersection of Athens and Industrial Avenues, is the largest new development activity within the plan area since 1997, having expanded to become a full-service casino with a 297-room hotel, spa, concert, and gaming facility. Additionally, some core industrial uses have started to take hold in the southeast corner of the plan area.

The first step in the planning process for the Sunset Area Plan was the characterization and assessment of existing conditions. This information is documented in the Draft Existing Conditions Report, published in October 2015, which takes an objective, policy-neutral "snapshot" of the plan area's current (2015) trends and conditions. A Market Analysis was completed in July 2015 and provides an overview of the dynamics of the South Placer market and explores the development potential in the plan area from an economic perspective. An Opportunities and Constraints Report, published in January 2016, focused on key issues and opportunities with potential policy implications for development of the plan area. The overall intent of the report was to direct the development of Area Plan goals, policies, and implementation programs.

### Placer Ranch Specific Plan

The 2,213-acre PRSP site is located in the southwestern portion of the plan area. Development of this area has been in the planning stages since 2003 when a local developer announced a gift to California State University Sacramento (Sac State) of approximately 300 acres of the PRSP site for a Sac State satellite campus and began pursuing land use entitlements through Placer County. Prior to release of the Draft EIR the applicant withdrew the development application from the County process in 2007.

In 2007, the PRSP applicant instead submitted the project to the City of Roseville for processing. The application was suspended in 2008.

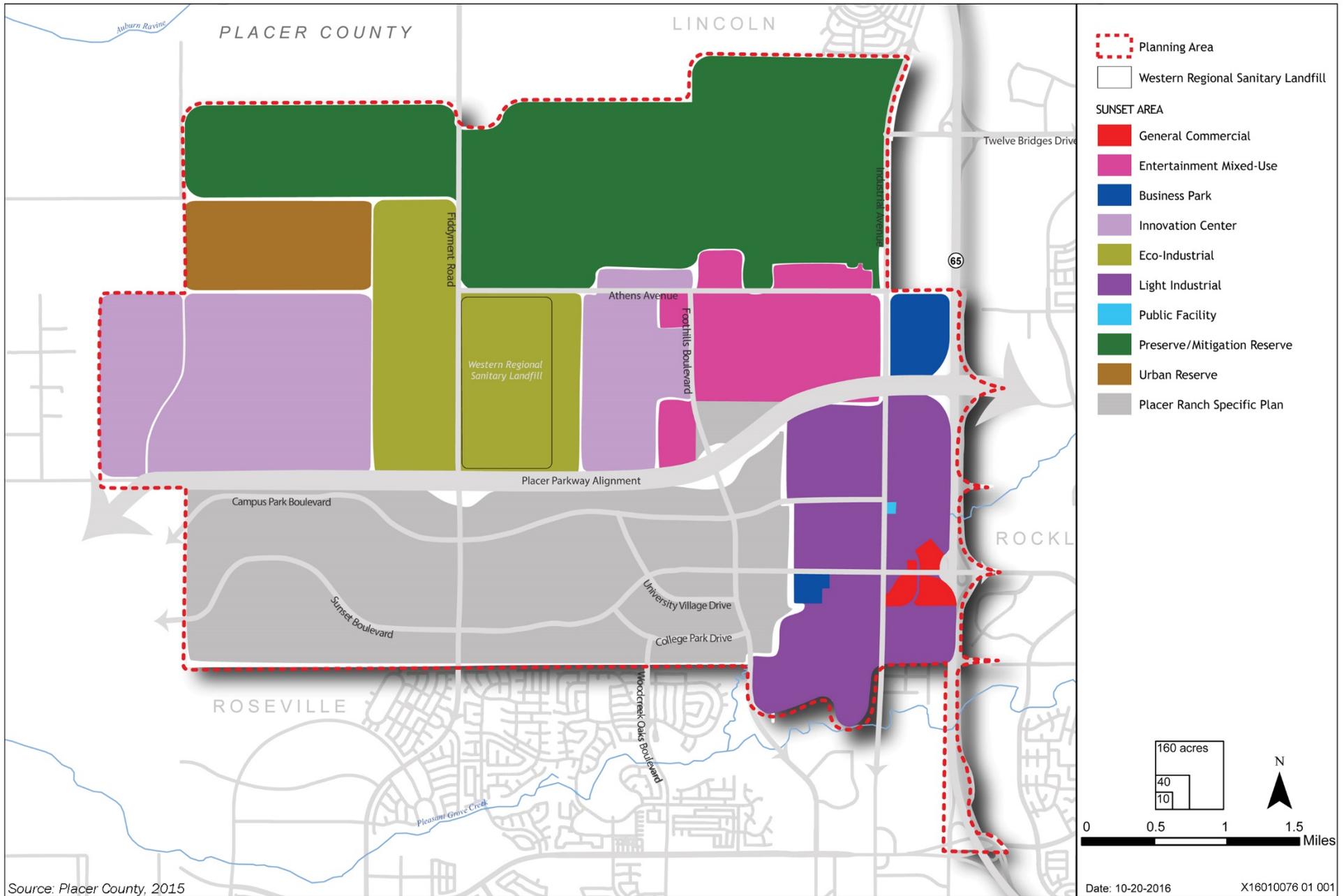
In 2013, Westpark Communities purchased the property and submitted a development application to the City of Roseville. In December 2014, the City of Roseville issued a NOP of a Draft EIR for the PRSP, including a request to amend the City of Roseville's sphere of influence, and annex the site into the City of Roseville. At the end of 2015, the City of Roseville suspended processing the PRSP application at the request of Westpark Communities. In May 2016, the Placer County Board of Supervisors authorized County staff to begin processing the PRSP in conjunction with the Sunset Area Plan Update.

## PROJECT DESCRIPTION SUMMARY

### Sunset Area Plan – Land Use

Moving away from the heavy industrial uses envisioned in the past, the Sunset Industrial Area, will now be more commonly referred to as the Sunset Area. The proposed Sunset Area Plan Land Use Diagram (see Exhibit 3) shows the proposed layout of land uses within the plan area. Table 1 shows the development capacity for the various land use designations within the plan area, including residential and non-residential densities for PRSP. Following are brief descriptions of the land use designations proposed for the Sunset Area Plan Land Use Diagram. (A description specific to the PRSP is provided after the description of the Sunset Area Plan.)

- ▲ **General Commercial (GC)** identifies a variety of urban commercial areas including shopping districts, service commercial areas, office areas, and neighborhood-serving commercial centers. This designation applies to areas along Sunset Boulevard near SR 65. Typical land uses allowed include: retail stores, restaurants, offices, service commercial uses, hotels and motels, recreation, education, and public assembly uses, medical services, child care facilities, necessary public utility and safety facilities, and similar and compatible uses.
- ▲ **Entertainment Mixed-Use (EMU)** provides for entertainment-oriented uses intended to draw visitors and customers from beyond South Placer County. This includes theme parks or super-regional destination retail, as well as associated shopping, restaurants, recreational facilities, and lodging. This category also allows for medical services, including hospitals and extended care establishments, as well as medical clinics, offices, and laboratories. Provision for workforce housing associated with, and subordinate to the Entertainment Mixed Use District is highly encouraged.
- ▲ **Business Park (BP)** provides for all types of employee-intensive industrial and professional uses including manufacturing, assembly, professional offices, and research and development facilities in a campus-like setting. Land uses that involve outdoor manufacturing or storage, or that emit any appreciable amount of visible gases, particulates, steam, heat, odors, vibrations, glare, dust, or excessive noise are not encouraged to locate within this designation.
- ▲ **Innovation Center (IC)** accommodates a mix of industry clusters, with a mix of small and large operations, in an amenity-rich setting. This includes retail and other services catering to other tenants/users in the areas. The proximity to the Sacramento State satellite campus in the PRSP provides an opportunity for academically-related businesses. Building types would reflect the diversity of users, including office, light industrial/flex, and small-scale retail. High quality, mixed density of housing within close proximity to all amenities, in support and related to the jobs center, is highly encouraged.
- ▲ **Eco-Industrial (EI)** supports integrated industrial and manufacturing uses focused on alternative waste-to-energy technologies, recovery and reuse of solid waste, and solid waste-related research and development, potentially in conjunction with the nearby waste management facilities and universities.
- ▲ **Light Industrial (LI)** provides for assembly, storage and distribution, and research and development activities in industrial parks with light industrial activities. In addition, transitional housing, supportive housing, and emergency shelters would be permitted, but only on publicly-owned land. Typical land uses allowed include: business support services, retail and service commercial uses to support manufacturing and processing activities and their employees, necessary public utility and safety facilities, transitional/supportive/emergency housing on public property, and similar and compatible uses.
- ▲ **Public Facility (PF)** accommodates government-owned facilities and quasi-public facilities in a variety of rural and urban settings. Typical land uses allowed include: government offices, service centers and other institutional facilities, schools, cemeteries, solid and liquid waste facilities, necessary public utility and safety facilities, landfills and other solid waste facilities, and similar and compatible uses.



**Exhibit 3**

**Sunset Area Plan Land Use Diagram**



<b>Table 1 Sunset Area Plan Land Use Designations and Development Capacity</b>									
Land Use Designation	Effective FAR <sup>1</sup>	Acres		Developable Acres <sup>2</sup>		Building Square Footage <sup>3</sup>		Jobs <sup>4</sup>	
		Total	% of Total	Total	% of Total	Total	% of Total	Total	% of Total
General Commercial	0.25	34.2	0.4%	26.8	0.6%	218,760	0.6%	410	0.7%
Entertainment Mixed-Use	0.25	516.8	6.2%	416.5	9.3%	3,401,500	9.3%	6,390	10.4%
Business Park	0.35	141.6	1.7%	81.3	1.8%	929,720	2.4%	1,710	2.8%
Innovation Center	0.35	1,244.7	14.9%	1,234.6	27.6	14,116,570	35.7%	25,970	42.2%
Eco-Industrial	0.40	927.4	11.1%	605.8	13.6%	7,916,360	20.0%	7,280	11.8.0%
Light Industrial	0.35	744.3	8.9%	308.3	6.9%	3,615,440	9.1%	3,300	5.4%
Public Facility		2.3	0.0%						
Preserve/Mitigation Reserve		1,955.4	23.4%						
Urban Reserve		320.4	3.8%						
Placer Ranch Specific Plan (Details Below)	varies	2,213.4	26.5%	1,535.4	34.4%	9,356,803	23.7%	16,465	26.8%
<b>Total</b>		<b>8,357.92</b>	<b>100.0%</b>	<b>4,466.07</b>	<b>100.0%</b>	<b>39,555.153</b>	<b>100.0%</b>	<b>61,525</b>	<b>100.0%</b>
<b>Specific Plan Land Uses</b>									
<b>Residential Uses</b>									
Low Density Residential		407.9	18.4%	407.9 ac	26.6%				
Low Density Residential - Age-Restricted		131.0	5.9%	131.0 ac	8.5%				
Medium Density Residential		132.3	6.0%	132.3 ac	8.6%				
High Density Residential		93.0	4.2%	93.0 ac	6.1%				
<b>Subtotal</b>		<b>764.2</b>	<b>34.5%</b>	<b>764.2 ac</b>	<b>49.8%</b>				
<b>Commercial and Employment Uses</b>									
General Commercial	0.30	25.6	1.2%	25.6 ac	1.7%	334,932.8	3.6%	670	4.1%
Commercial Mixed Use	0.30	48.8	2.2%	48.8 ac	3.2%	637,718.4	6.8%	1,275	7.7%
Campus Park (Mix of Office, GC, R&D, & LI)	0.31	395.5	17.9%	395.5 ac	25.8%	5,384,152.1	57.5%	8,787	53.4%
University (CSU Campus)		301.3	13.6%	301.3 ac	19.6%	3,000,000.0	32.1%	5,733	34.8%
<b>Subtotal</b>		<b>771.2</b>	<b>34.8%</b>	<b>771.2 ac</b>	<b>50.2%</b>	<b>9,356,803.4</b>	<b>100.0%</b>	<b>16,465</b>	<b>100.0%</b>
<b>Open Space and Public Uses</b>									
Public Facilities (Schools)		32.0	1.4%						
Public Facilities (County Facilities)		5.5	0.2%						
Parks and Recreation		72.6	3.3%						
Open Space Preserves		250.9	11.3%						
<b>Subtotal</b>		<b>360.9</b>	<b>16.3%</b>						
<b>Other</b>									
Placer Parkway		158.5	7.2%						
Major Roadways & Landscape Corridors		158.5	7.2%						
<b>Subtotal</b>		<b>317.0</b>	<b>14.3%</b>						
<b>Total</b>		<b>2,213.3</b>	<b>100.0%</b>	<b>1,535.4 ac</b>	<b>100.0%</b>	<b>9,356,803.4</b>	<b>100.0%</b>	<b>16,465</b>	<b>100.0%</b>

<sup>1</sup> Typical build out intensity for each use type expressed as Floor-Area-Ratio.

<sup>2</sup> Includes vacant and underutilized land.

<sup>3</sup> Reflects gross-to-net acreage conversion factor of 75 percent (accounting for public rights-of-way, on-site open space, etc.).

<sup>4</sup> Assumes 500 square feet per employee for General Commercial, Entertainment Mixed-Use, Business Park, and Innovation Center; assumes 1,000 square feet per employee for Eco-Industrial and Light Industrial; assumes 6 to 8 percent vacancy rates.

- ▲ **Preserve/Mitigation Reserve (P/MR)** covers three existing reserves—Orchard Creek Conservation Bank, Warm Springs Mitigation Bank, and Moore Ranch Conservancy, as well as other land suitable for future reserves and mitigation banks.
- ▲ **Urban Reserve (UR)** includes land that will be well-suited for urban uses (e.g., Commerce Park, Business Park, innovation centers) with future extension of urban infrastructure and high-capacity transportation access. In the short- and mid-term, however, this area should remain in a reserve designation that will allow for more detailed planning once the market is ready.

### **Sunset Area Plan - Utilities**

Initially, water pipelines would be extended to the site from Placer County Water Agency's (PCWA) existing infrastructure (pumping facilities, storage tank, transmission mains) from an off-site location. The proposed on-site water distribution system would be designed as a looped system following major arterial and collector street alignments for a transmission main grid consisting of 12-inch to 24-inch diameter mains. Connections to proposed pipelines within the PRSP would be constructed, which would connect to existing water transmission lines off-site and south of the PRSP. At full buildout, the on-site potable water infrastructure would include a water storage tank, sized in accordance with PCWA's master planning criteria.

To reduce the demand for potable water, recycled water (tertiary treated) would be provided from the Dry Creek Wastewater Treatment Plant (DCWWTP) and Pleasant Grove Wastewater Treatment Plant (PGWWTP) to the south of the plan area, and/or from the City of Lincoln Wastewater Treatment and Reclamation Facility (LWWTRF) immediately north of the plan area. This recycled water would be used for landscape irrigation, for non-residential and other non-potable public uses, and potentially for process water in some industrial uses.

For wastewater treatment, areas generally located south of Athens Avenue would use the PGWWTP for treatment of effluent. Effluent generated in areas generally north of Athens Avenue could be directed to the LWWTRF for treatment. Wastewater flows would be directed to either treatment plant by a network of pipes installed within street rights-of-way or easements. Sewage would be conveyed by both gravity lines and sewer force mains. The site's topography would require the installation of strategically placed on-site sewer lift stations for the force main sewer pipes.

Development of the plan area would require installation of on-site drainage conveyance facilities, as well as require alteration of site topography in some areas to accommodate the proposed land uses while mitigating drainage impacts. Drainage facilities would be sized to avoid increases in peak water flow rate and/or surface water elevation changes (both upstream and downstream), for up to and including the 100-year storm event. Further, stormwater retention will be provided to assure no impacts due to loss of stormwater storage capacity. Lastly, the PRSP would include on-site construction of stormwater quality treatment facilities.

Solid waste collection is provided by Recology Auburn Placer, providing both residential and commercial services, as well as debris box services. All material collected by Recology is transported to the West Placer Waste Management (WPWMA) facility located at 3033 Fiddymont Road, Roseville. The WPWMA facilities encompass approximately 320 acres, and include a materials recovery facility, composting facility and the Western Regional Sanitary Landfill.

### **Sunset Area Plan - Off-Site Improvements**

Implementation of the Sunset Area Plan would require off-site improvements to connect roadways, infrastructure and dry utilities, and to construct drainage improvements. The following is a preliminary list of off-site improvements required for the Sunset Area Plan.

- ▲ **Roadway Improvements**
  - Sunset Boulevard West
  - Foothills Boulevard (South of the project boundary)
  - Campus Park Boulevard/Cincinnati Avenue Extension
  - Fiddymont Road North of the project boundary

- ▲ Infrastructure
  - Placer Parkway Water Line
  - Fiddymment Road and Foothills Boulevard Sanitary Sewer Lines south
  - Fiddymment Road Sanitary Sewer Line north to LWWTRF
  - Foothills Boulevard Water Line
  - Westbrook Water Line Extension
  - Westbrook Recycled Water Line Extension
  - Stormwater retention facility at a facility to be determined.
  
- ▲ Infrastructure Connections within Existing Rights-of-Way and/or Easements
  - Grove Hill Way – water line, sewer line
  - Fiddymment Road – water line
  - Woodcreek Oaks Boulevard –water line, sewer line, recycled water line
  - Foothills Boulevard – water line
  - Nichols Drive – water line, sewer line
  - Sunset Boulevard – water line
  - Cincinnati Avenue – water line
  - Duluth Avenue – water line, sewer line

### Placer Ranch Specific Plan

The proposed Placer Ranch Specific Plan (PRSP) land use map (see Exhibit 4) includes residential, commercial and employment, parks and recreation, and public facilities uses. The acreages, number of units, and development capacity for each use type is shown in Table 1 above. The land use designations proposed for the PRSP include the following:

#### Residential

The PRSP would include 5,287 residential dwelling units on 764.2 acres. Densities range from one to 30 units per acre, as shown in Table 2 below. The proposed PRSP would allow for development of a variety of attached and detached housing types, which are intended to accommodate various household characteristics, preferences, and income levels. PRSP includes the following residential development types (proposed residential densities are provided in Table 2):

<b>Table 2 PRSP Residential Units by Density</b>				
<b>Residential Type</b>	<b>Residential Density per Acre</b>	<b>Acres</b>	<b>Units</b>	<b>Percentage of Total Residential Units</b>
Low Density Residential (LDR)	1-7 units/acre	407.9 ac	2,039 du	35.0%
Low Density Residential – Age-Restricted (LDR-A)	1-7 units/acre	131.0 ac	720 du	12.4%
Medium Density Residential (MDR)	6-13 units/acre	132.3 ac	1,057 du	18.1%
High Density Residential (HDR) <sup>1</sup>	12-30 units/acre	93.0 ac	2,011 du	34.5%
<i>Total</i>		764.2 ac	5,827 du	100%

<sup>1</sup> Includes 150 density bonus units that can be used on any MDR, HDR, or CMU parcel within the University Town Center district.

- ▲ **Low Density Residential (LDR):** generally located in the southern and western portions of the Plan Area.
  
- ▲ **Low-Density Residential – Age Restricted (LDR-A):** includes 720 age-restricted units (for residents 55 years and older) in the southwest quadrant of the Placer Ranch Specific Plan project site.
  
- ▲ **Medium Density Residential (MDR):** located in proximity to commercial areas, near employment uses and the university, and along public transportation routes.



Source: MacKay & Somp, 2016

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**Exhibit 4**

**Placer Ranch Specific Plan Land Use Diagram**



- ▲ **High Density Residential (HDR):** generally located in proximity to commercial areas, near employment uses and the university, and averages a density of 20 units per acre, which could be slightly increased within the University Town Center (UTC) district where the 150 density bonus units may be allocated to any MDR, HDR, or Commercial Mixed Use (CMU) parcel.

Consistent with the Affordable Housing Goals and Policies in the Placer County General Plan, 10 percent of the housing units would be made affordable to middle-, low-, and very-low income households.

### Commercial and Employment Uses

Commercial and employment uses account for nearly 35 percent (771.2 acres) of the acreage of the PRSP and include over 9 million square feet of commercial, commercial mixed use, campus park, and university-related uses.

- ▲ **General Commercial (GC)** provides for a broad range of retail goods and services, which can accommodate large-scale commercial centers, conventional neighborhood shopping centers, and mixed use commercial/office developments.
- ▲ **Commercial Mixed Use (CMU)** allows for a mix of non-residential uses, with flexibility to incorporate high-density residential units. This is envisioned to include a mixture of retail, service, restaurant, office, medical, entertainment, hotel, or similar uses. In addition, CMU parcels may incorporate a residential component as an ancillary use to a commercial/office project, and units may be transferred to CMU sites from the pool of 150 density bonus units or from other HDR parcels in the PRSP.
- ▲ **Campus Park (CP)** provides for a variety of use types including professional office, research and development, commercial, and light industrial. The CP designation allows for multi-level office flex-space buildings that could accommodate office uses, technology-oriented uses, and manufacturing/assembly uses in a business park setting.
- ▲ **University (UZ)** is intended specifically for the development of a public university on a 301.3-acre site in the center of the PRSP. This site would be designated for a Sac State satellite campus co-located with a transfer facility for Sierra College. At full build out, the satellite campus of Sac State is planned for a four-year university sized to serve 30,000 full-time equivalent students (5,000 of which would be associated with Sierra College) and 4,000 to 5,000 faculty and staff. The university site includes approximately 58 acres of internal open space areas to accommodate natural features (tributaries to Pleasant Grove Creek, wetland features) and to create natural amenities on the campus.

### Parks and Open Space

The PRSP would provide approximately 72.6 acres of active parkland in several sites for the development of individual parks, paseos, and greenbelts.

- ▲ **Open Space (OS)** includes 250.9 acres of permanent open space associated with existing, on-site natural features (Pleasant Grove Creek tributaries, wetland features). The open space parcels would be preserved in perpetuity with a conservation easement. Prior to any development activity, a Long-Term Management Plan (LTMP) would be prepared to describe the management practices and requirements for the open space preserves as well as permitted uses and maintenance obligations. Within the OS parcels, it is anticipated that several uses could occur, including creation of fire/fuel modification zones, mowing activities, grading and construction activities, pedestrian and bikeway paths, storm drainage features, utility crossings, and other uses as permitted via the LTMP.

### Public Facilities

A 10.6-acre elementary school site and 21.3-acre middle school site are proposed in the residential neighborhoods west of Fiddymont Road, which are within the Roseville City School District.

Other public facilities anticipated within the PRSP include potable water storage, groundwater wells (to provide backup supply), recycled water storage, sewer lift stations, and an electric substation.

**Right-of-Way**

The PRSP includes 317.0 acres of right-of-way for major roadways and landscape corridors. Major roadways within the PRSP would include Sunset Boulevard, Campus Park Boulevard, Placer Parkway, Fiddymont Road, Woodcreek Oaks Boulevard, and Foothills Boulevard.

**Potential Environmental Impacts**

The EIR will describe the direct and indirect environmental impacts of the proposed project. At this time, it is anticipated that the EIR will address potential impacts associated with the proposed project in the following issue areas:

- ▲ Aesthetics
- ▲ Agricultural Resources
- ▲ Air Quality and Odors
- ▲ Biological Resources
- ▲ Cultural Resources
- ▲ Geology, Soils, and Minerals
- ▲ Greenhouse Gas Emissions and Climate Change
- ▲ Hazards and Hazardous Materials
- ▲ Hydrology and Water Quality
- ▲ Land Use and Planning
- ▲ Noise
- ▲ Population and Housing
- ▲ Public Services
- ▲ Transportation/Traffic
- ▲ Utilities and Energy
- ▲ Other CEQA Sections, including alternatives, growth-inducing impacts, and cumulative impacts.

**Aesthetics**

The project area is located within a relatively flat area at the base of the Sierra Nevada foothills. The Sierra Nevada are distantly visible. Thunder Valley Casino Resort and the Western Regional Sanitary Landfill (WRSL) are the two most prominent visual features within the plan area. The 17-story hotel and casino structure is visible throughout much of the plan area and can also be seen from residential developments to the north. A power transmission line transects the plan area northwest to southeast, and the large transmission line towers are visible from most of the site. Although some portions of the plan area are characterized by open agricultural land and are of higher quality, many views are dominated by the casino, the landfill, or other urban land uses. Development of the proposed project would change the existing visual character within the project area.

**Agricultural Resources**

Most of the plan area is currently used either for open space or agriculture. Open space is in the form of conserved lands, agricultural land, and vacant lands. A substantial amount of the plan area (approximately 70 percent) is currently identified as Important Farmland by the Farmland Mapping and Monitoring Program (FMMP). The plan area includes 720 acres of farmland currently under Williamson Act contract. Implementation of the proposed project would result in conversion of existing agricultural resources within the project area to non-agricultural uses and new residences would be located in an area dominated by agricultural uses, which could result in land use incompatibilities.

**Air Quality**

During construction of the proposed project, criteria air pollutant emissions would be temporarily and intermittently generated. Operation of the proposed project would result in air pollutant emissions from project-generated motor vehicle trips and stationary sources. Construction- and operations-related emissions could adversely affect sensitive receptors in the vicinity. Existing land uses within the plan area, including the landfill, as well as proposed future land uses, could emit odors that could affect existing and proposed sensitive receptors.

**Biological Resources**

Approximately 1,000 acres (12 percent) of the plan area are preserved as permanent open space in three existing conservation reserves in the northern portion of the plan area: the Orchard Creek Conservation

Bank, Warm Springs Mitigation Bank, and Moore Ranch Conservancy mitigation sites. Additionally, a large portion of the plan area (approximately 1,300 acres) adjacent to these existing reserves is identified and being considered in the Placer County Conservation Plan (PCCP) as a possible reserve acquisition area.

Given the proximity to riparian creek corridors, special-status plant or wildlife species could potentially occur in the project area. Implementation of the proposed project could result in disturbance or take of special-status species or disturbance or removal of suitable habitat for these species or interference with wildlife movements.

Aquatic features identified in the project area include vernal pools, riverine/riparian areas, marshes, and ponds. The project could potentially remove, fill, or hydrologically interrupt wetlands identified in the project area and could potentially affect jurisdictional waters.

Placer County's Tree Preservation Ordinance (Placer County Code, Article 12.20) is applicable to all native, landmark trees, riparian zone trees, and certain commercial firewood operations. In accordance with the Tree Preservation Ordinance, a discretionary project shall evaluate the potential impacts to all protected trees sized 6-inches diameter at breast height or larger as part of the development review process. Implementation of the project could result in removal of trees protected under the tree ordinance.

Placer County is currently working on the PCCP, which would streamline the permitting process by allowing Placer County and the City of Lincoln to extend state and federal permit coverage to public and private projects. The proposed PCCP is a Habitat Conservation Plan (HCP) under the Federal Endangered Species Act and a Natural Community Conservation Plan (NCCP) under the California Natural Community Conservation Planning Act. As proposed, the PCCP would include the County Aquatic Resources Program (CARP) permit coverage for covered activities under the Program related to the Federal Clean Water Act and the State's Porter-Cologne Water Quality Act. The EIR will discuss the status of the PCCP and the project's compliance with anticipated policies.

## **Cultural Resources**

The plan area includes known and prehistoric and historic resources. Also, watercourses exist on the site, which could increase potential for unknown archaeological resources. Given the occurrence of known resources and the potential for previously unknown resources to be discovered during project implementation, the EIR will provide a complete analysis of potential impacts to cultural resources.

## **Geology, Soils, and Minerals**

The Foothills Fault System is the nearest major zone of faulting to the plan area. This system is located to the east along the western flank of the Sierra Nevada. The plan area is within Seismic Zone 3 (a moderate risk zone) of the Uniform Building Code (UBC). The plan area has a very low potential of slope instability due to the lack of relief (slopes are generally less than 9 percent) across the area and the distance from active and potentially active faults. The predominant soils all have a moderate susceptibility to erosion. The erosion potential of the soils on or at the near surface is considered to be low due in part to the presence of higher clay content soils and generally low relief across the plan area. Due to the existence of clayey soils, the EIR will evaluate the potential for risk from expansive soils.

The California Geological Survey (CGS) has mapped mineral and mineral aggregate resources in Placer County. The MZ-4 designation occurs throughout the plan area. The MZ-4 designation is defined as "areas of no known mineral occurrences where geologic information does not rule out either the presence or absence of significant mineral resources." No mineral extraction operations exist in the plan area.

## **Greenhouse Gases and Climate Change**

Greenhouse gas (GHG) emissions generated by the proposed project during construction would predominantly be in the form of carbon dioxide (CO<sub>2</sub>). Emissions would be associated with mobile-source exhaust from construction worker commute trips, truck haul trips, and equipment used in the project area (e.g., excavators, graders, helicopters). Operation of the proposed project would also result in GHG emissions from area sources including stationary equipment such as operating internal combustion engine powered

generators. Operations-related GHG emissions also include mobile sources, such as employee- and resident-related vehicle trips, as well as emissions associated with increased energy demand.

## **Hazards and Hazardous Materials**

Past land uses include agricultural and industrial uses, which may have resulted in undocumented contamination of soil and groundwater within the plan area. Several facilities within the plan area use fuel and hazardous materials and generate wastes. These facilities are governed by material use, waste generation, and risk management policies/procedures. Some sites within the plan area boundary are further regulated as chemical release sites.

Proposed industrial uses may involve use of hazardous materials, and the existing rail may transport hazardous materials. The EIR will evaluate potential land use conflicts associated with development of proposed residential uses within the vicinity of industrial uses and the heavy rail facility.

Placer County communities are becoming more susceptible to wildfire risk as a result of past fire suppression efforts coupled with increases in population. The plan area lies within a wildland urban interface (WUI) boundary; fires in WUI areas can result in loss of property and structures.

## **Hydrology and Water Quality**

The plan area is crossed by several intermittent drainage-ways and one permanent stream. Flooding occurs in areas adjacent to local creeks during periods of heavy rainfall. As development of proposed land uses converts open agricultural areas to industrial and commercial development within the plan area, and as more impervious surfaces are constructed, the potential for storm flows to increase over time could also increase flooding potential within the plan area and areas downstream. Additionally, development of the Sunset Area Plan will reduce natural stormwater storage capacity. Detention and retention will be provided to minimize increases in peak and volumetric stormwater flows. Retention may be provided at a facility to be determined. The environmental impacts of providing the necessary retention at off-site locations will be analyzed in the EIR.

Project-related construction activities could result in soil erosion, siltation, or flooding. Specifically, construction activities such as grading could result in disturbance of soils and sediments that could be carried into surrounding water bodies during storm events. Further, accidental discharges of construction-related fuels, oils, hydraulic fluid, and other hazardous substances could contaminate stormwater flows or increase siltation in nearby water bodies, resulting in a reduction in stormwater quality on or downstream of the project area. New impervious surfaces that would be constructed as part of the project could increase the volume of runoff coming from the project area or alter the drainage pattern of the project area sufficiently to result in increased erosion or siltation. Runoff could contain oils, grease, fuel, sediments, brake dust, and other potential water pollutants. During storm events, these pollutants could be carried to downstream receiving waters.

## **Land Use and Planning**

The current SIA Plan was adopted by the Board of Supervisors in 1997. The proposed update would provide a new vision for development of the area, one that is intended to be more harmonious with surrounding existing and future development. Existing uses within the plan area include industrial, commercial, and rural residential. The plan area is also the site of the Western Regional Sanitary Landfill (WRSL) a regional landfill. Implementation of the project would include development of industrial and residential land uses. The EIR will evaluate potential land use incompatibilities.

## **Noise**

Existing noise sources within the plan area include vehicle traffic noise from State Route 65 (SR 65) and other roadways, trains utilizing the Union Pacific Railroad (UPRR) lines, airplanes using the Lincoln Regional Airport, and existing industrial uses within the plan area. Construction-related noise sources associated with project implementation would include both mobile and stationary equipment. Construction would also generate truck trips associated with the delivery of supplies and hauling away of excess fill and construction

debris. The project's long-term operations could result in the exposure of people to additional long-term operational noise levels, and additional noise may exceed the applicable County noise standards.

## **Population and Housing**

The plan area is mostly vacant land with a few rural residences in the northwest corner of the plan area. Implementation of the project would add a substantial number of new homes, which would lead to population growth in the area. Consistent with the Affordable Housing Goals and Policies in the Placer County General Plan, 10 percent of the housing units would be made affordable to middle, low, and very low income households.

## **Public Services**

Development under the proposed project would bring new residents and other urban land uses to the plan area. New residents and other urban uses would create a need for additional fire and police services, schools, and parks. The EIR will estimate the population that would be generated by the project, and will evaluate the impacts related to providing adequate public services.

## **Transportation and Circulation**

Project construction would result in construction worker commute trips and haul truck trips (for delivery and transport of materials and equipment) to and from the project area, resulting in increased traffic levels on local roadways.

SR 65 is located adjacent to the eastern edge of the plan area. Implementation of the project would develop additional roadways within the plan area. This includes construction of new bridges and improvements to existing roadways and bridges. The planned Placer Parkway would bisect the plan area from west to east, connecting to SR 65. New traffic generated by implementation of the project would include new residents, new employees and patrons of new industrial and commercial areas, and new truck trips related to industrial deliveries. Impacts of the project from both short-term and long-term traffic will be evaluated in the EIR.

## **Utilities and Energy**

New residential, commercial, and industrial uses would generate demand for potable water, recycled water, wastewater collection and treatment, solid waste hauling and disposal, and energy. Demand for these utilities is tied to population and building area of non-residential development. The EIR will include calculations of the estimated demand for these utilities, as well as analysis of the impacts of providing these utilities.

## **Cumulative Impacts**

Implementation of the proposed project could potentially result in significant impacts to the above resource areas. When taken together with the effects of past projects, other current projects, and probable future projects, the project's contribution to the overall cumulative effect of all these activities could be considerable.

## **ALTERNATIVES TO BE EVALUATED IN THE EIR**

In accordance with the State CEQA Guidelines (14 CCR Section 15126.6), the EIR will describe a range of reasonable alternatives to the proposed project that are capable of meeting most of the projects' objectives, and that would avoid or substantially lessen any of the significant effects of the project. The EIR will also identify any alternatives that were considered but rejected by the lead agency as infeasible and briefly explain the reasons why. The EIR will provide an analysis of the No-Project Alternative and will also identify the environmentally superior alternative.

## POTENTIAL PERMITS AND APPROVALS REQUESTED

The project requires the following actions and approvals from Placer County:

- ▲ Certification of the Environmental Impact Report (EIR) for the Sunset Area Plan and Placer Ranch Specific Plan, and adoption of the Mitigation Monitoring and Reporting Plan;
- ▲ Adoption of the Sunset Area Plan designating PRSP as Specific Plan;
- ▲ Adoption of new zoning for the Sunset Area Plan.
- ▲ Rezone from Industrial (INP-DC and INP-DC-FH), Commercial (C2-UP-DC) and Farm (F-B-X-160-DR-SP, F-B-X-80, F-B-X-80-SP) to SPL-PRSP;
- ▲ Adoption of the PRSP, Development Standards, and Design Guidelines;
- ▲ Large Lot Tentative Subdivision Map for the PRSP to divide existing parcels totaling 2,213.3 acres into multiple parcels;
- ▲ Small Lot Tentative Subdivision Map(s) for the PRSP;
- ▲ Development Agreement between the County of Placer and Placer Ranch, Inc.

In addition, the project may require permit approvals from Responsible Agencies. The following is a list of approvals/permits necessary from other agencies to implement the proposed PRSP project:

- ▲ Approval of National Environmental Policy Act (NEPA) document (United States Army Corps of Engineers);
- ▲ Section 404 Individual Permit (United States Army Corps of Engineers);
- ▲ Section 401 Water Quality Certification (Regional Water Quality Control Board – Central Valley Region);
- ▲ Section 7 Consultation (United States Fish and Wildlife Service and National Marine Fisheries Service);
- ▲ Master Reclamation Permit for Recycled Water (State Water Resources Control Board);
- ▲ Section 402 National Pollutant Discharge Elimination System Permit Approval (Regional Water Quality Control Board – Central Valley Region);
- ▲ Streambed Alteration Agreement (California Department of Fish and Wildlife); and
- ▲ Amendment of the Wastewater Service Area boundaries.

## DOCUMENTS AVAILABLE FOR PUBLIC REVIEW

The NOP is available for public review at the following locations:

Placer County Community Development Resources Agency  
3091 County Center Drive, Suite #190  
Auburn, CA 95603

The NOP is also available for public review on Placer County's website:

<http://www.placer.ca.gov/Departments/CommunityDevelopment/EnvCoordSvcs/EIR.aspx>.

## PROVIDING COMMENTS

Agencies and interested parties may provide the County with written comments on topics to be addressed in the EIR for the project. Because of time limits mandated by State law, comments should be provided no later than 5:00 p.m. on **December 16, 2016**. Please send all comments to:

Placer County, Community Development Resources Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603  
Attention: Shirlee Herrington, Environmental Coordination Services  
Telephone: (530) 745-3132 Fax: (530) 745-3080  
Email: cdraecs@placer.ca.gov

Agencies that will need to use the EIR when considering permits or other approvals for the proposed project should provide the name of a contact person. Comments provided by email should include "Sunset Area Plan/Placer Ranch Specific Plan NOP Scoping Comment" in the subject line, and the name and physical address of the commenter in the body of the email.

All comments on environmental issues received during the public comment period will be considered and addressed in the Draft EIR, which is anticipated to be available for public review in summer 2017.

### **PUBLIC SCOPING MEETINGS**

Two public scoping meetings will be held by the County to inform interested parties about the proposed project, and to provide agencies and the public with an opportunity to provide comments on the scope and content of the EIR. The meeting times and location are as follows:

November 29, 2016  
First meeting from 3:00-5:00 p.m. and second meeting from 6:00-8:00 p.m.  
Western Placer Waste Management Authority Materials Recovery Facility  
3033 Fiddymont Road, Roseville, CA 95747

The meeting space is accessible to persons with disabilities. Individuals needing special assistive devices will be accommodated to the County's best ability. For more information, please contact Shirlee Herrington (at the contact information above) at least 48 hours before the meeting.



December 16, 2016

SENT VIA E-MAIL: SHerring@placer.ca.gov

Shirlee Herrington,  
Environmental Coordination Services  
Placer County  
Community Development Resources Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

**SUBJECT: Notice of Preparation of a Draft Environmental Impact Report for Proposed Sunset Area Plan/Placer Ranch Specific Plan Project**

Ms. Herrington,

Thank you for submitting the **Notice of Preparation of a Draft Environmental Impact Report for Proposed Sunset Area Plan/Placer Ranch Specific Plan Project** (Project) to the Placer County Air Pollution Control District (District) for review and comment. Placer County (County) is proposing to update the Sunset Industrial Area (SIA) Plan (now being named the Sunset Area Plan as part of the update), which includes the proposed Placer Ranch Specific Plan. The District provides the following comments for consideration.

1. The District's Board of Directors adopted CEQA Thresholds of Significance for criteria pollutants and Greenhouse Gas (GHG) on October 13, 2016. The following tables summarize the adopted thresholds:

Criteria Pollutant Thresholds								
Construction Phase			Operational Phase Project-Level			Operational Phase Cumulative-Level		
ROG	NOx	PM <sub>10</sub>	ROG	NOx	PM <sub>10</sub>	ROG	NOx	PM <sub>10</sub>
(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)
82	82	82	55	55	82	55	55	82

Greenhouse Gas Thresholds			
<b>Bright-line Threshold</b> 10,000 MT CO <sub>2</sub> e/yr			
<b>Efficiency Matrix</b>			
Residential		Non-residential	
Urban	Rural	Urban	Rural
(MT CO <sub>2</sub> e/capita)		(MT CO <sub>2</sub> e/1,000sf)	
4.5	5.5	26.5	27.3
<b>De Minimis Level</b> 1,100 MT CO <sub>2</sub> e/yr			

The District recommends applying the District's adopted thresholds to determine the level of significance for the Project's related criteria pollutants and GHG impacts.

2. The District's California Environmental Quality Act (CEQA) Air Quality Handbook (Handbook) provides recommended analytical approaches and feasible mitigation measures when preparing air quality analyses for land use projects. The Handbook is available on the District's website at <http://www.placer.ca.gov/departments/air/landuseceqa>. Except where noted below additional detail relating to the following recommended items can be found within the Handbook.

- The Project is located within the Sacramento Valley Air Basin (SVAB) and is under the jurisdiction of the District. The SVAB is designated as nonattainment for federal and state ozone (O<sub>3</sub>) standards, nonattainment for the federal particulate matter standard (PM<sub>2.5</sub>) and state particulate matter standard (PM<sub>10</sub>). Within the Air Quality section of the Initial Study, the District recommends the discussion include the area designations for the federal and state standards for the SVAB.
- The California Emissions Estimator Model (CalEEMod) is recommended when estimating the Project related air pollutants emissions from construction and operational phases. CalEEMod quantifies criteria pollutant emissions, including greenhouse gases (GHGs) from construction and operation (including vehicle use), as well as GHG emissions from energy production, solid waste handling, vegetation planting and/or removal, and water conveyance. In addition, CalEEMod calculates the benefits from implementing mitigation measures, including GHG mitigation measures, developed and approved by CAPCOA. During 2016, the CalEEMod Version 2016.3.1 was released which incorporates the California Air Resources Board's OFFROAD and EMFAC 2014 updates. No prior versions of CalEEMod should be used. Please contact the District for information on appropriate default settings applicable to the project area.

The District requests copies of all modeling analysis files during the review of the DEIR for public review and comment.

- In the event the air quality analysis demonstrates the potential for the Project to cause or generate significant adverse air quality related impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. Additional mitigation measures can be found in the District's CEQA Handbook within the following related appendices.

**Appendix A. Recommended Mitigation Measures (Construction)**

**Appendix B. District Rules and Regulations (Construction)**

**Appendix C. Recommended Mitigation Measures (Operational)**

**Appendix D. District Rules and Regulations (Operational)**

**Appendix G. Mitigation Measures (Greenhouse Gases)**

3. As previously stated, the Project is located within the SVAB and is designated nonattainment for the PM<sub>2.5</sub> standard. PM has been linked to a range of serious respiratory and cardiovascular health problems<sup>1</sup>. Wood burning devices are a source of PM emissions which contribute to the region's air pollution. The District recommends that the construction, installation or use of wood burning devices be prohibited within the Project area. Only natural gas or propane fired fireplace appliances shall be allowed. These appliances shall be clearly delineated on the Floor Plans submitted in conjunction with the Building Permit application.
4. The District recommends a CALINE 4 modeling analysis for carbon monoxide (CO) concentration be performed and discussed within the environmental document if any intersection or roundabout is determined by the traffic study to degrade to a level of service "E" or "F" as a result of this project, alone or cumulatively; or where the total project-level CO emissions exceed 550 lbs/day.
5. The District recommends that the DEIR identify and analyze potential health impacts from locating land uses, where sensitive individuals are most likely to spend time (i.e., schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities), that are within 500 feet to any existing or proposed major road ways (urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day), as well as stationary sources, where there is the potential for exposure to toxic air contaminants (TAC) and other hazardous air pollutants (e.g., such as diesel particulate matter (DPM) from diesel exhaust). If an impact is identified, the DEIR should describe the level of analysis, such as a Health Risk Assessment (HRA) or other modeling analysis,

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<sup>1</sup> <http://www.epa.gov/ncer/science/pm/>

necessary to determine if the Project will have the potential to cause adverse health impacts. The DEIR should also include discussion and analysis of the future Placer Parkway.

Additionally, the following strategies are recommended by the California Air Resources Board to minimize health related impacts on sensitive receptors proposed within close proximity to any identified major road way or stationary source. Additional guidance is provided within Chapter 4 of the District's Handbook.

- Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day;
  - Avoid siting new sensitive land uses within 1,000 feet of a distribution center;
  - Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation, from the property lines is recommended for typical gas dispensing facilities.
6. The Western Placer Landfill and Material Recovery Site is located just north of the Sunset area. Historically, the District has received numerous complaints from the public relating to odors emitted from this facility. The District recommends that the DEIR analyzes the odor impacts associated with this facility and identifies control strategies with the facility to mitigate the potential odor impacts in the proposed planning area.

Thank you for allowing the District this opportunity to review the project proposal. Please do not hesitate to contact me at 530.745.2327 or [ahobbs@placer.ca.gov](mailto:ahobbs@placer.ca.gov) if you have any questions.

Sincerely,



Ann Hobbs  
Air Quality Specialist  
Planning & Monitoring Section

cc: Yushuo Chang, Planning & Monitoring Section Supervisor

**DEPARTMENT OF TRANSPORTATION****DISTRICT 3**

703 B STREET  
MARYSVILLE, CA 95901  
PHONE (530) 741-4286  
FAX (530) 741-5346  
TTY 711  
www.dot.ca.gov/dist3



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December 8, 2016

GTS# 03-2016-PLA-00035  
03-PLA-65  
SCH# 2016112012

Ms. Shirlee Herrington  
Placer County CDRA  
3091 County Center Drive  
Auburn, CA 95603

**Sunset Area Plan/ Placer Ranch Specific Plan Project**

Dear Ms. Herrington,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development for impacts to the State Highway System in keeping with our mission, vision and goals for sustainability/livability/economy, and safety/health. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy, and build communities, not sprawl.

The proposed project is the Sunset Industrial Area, which includes the Placer Ranch Specific Plan (PRSP) project site, encompasses 8,358 acres located in unincorporated south Placer County. The Sunset Area Plan will bring forward new land use designations, including: General Commercial, Entertainment/Mixed Use; Business Park; Innovation Center; Eco-Industrial; Light Industrial; Public Facility; and Urban Reserve. The 2,213-acre Placer Ranch Specific Plan (PRSP) is a mixed-use community proposed in the Sunset Area Plan consisting of 5,827 residential units including a 720 unit age-restricted community; an elementary school, middle school, 323.5 acres of neighborhood parks and open space; and 6,356,800 sq. ft. of general commercial, commercial mixed use, and campus park (office, research and development, light industrial, and commercial) uses complementary to the university. The proposed university and non-residential land uses of the project are intended as a catalyst for employment-generating development in Placer County's overall Sunset Area. The following comments are based on the Notice of Preparation (NOP).

### ***Traffic Operations***

The draft EIR is to include a transportation analysis of local and State facilities within the project vicinity to determine potential project impacts to those facilities as well propose improvements to mitigate those impacts. The Transportation Impact Study (TIS) scope should include SR65, Placer Parkway, and I-80, as well as transit, bicycle and pedestrian facilities within the project vicinity.

Please identify traffic impact in terms of Vehicle Miles Travelled (VMT) and traffic safety. Will there be a reduction or an increase in VMT with the project? The following analyses needs to be added to the TIS scope:

- Peak hour zone to zone Origin-Destination matrixes
- Peak hour VMT Calculation based on O-D matrixes and trip generation
- Weekday zone to zone Origin-Destination matrixes
- Weekday VMT calculation based O-D matrixes and trip generation
- Provide Synchro output for Length of Queue for all off-ramp analyses.

The TIS should identify possible mitigation to reduce VMT and consider possible impacts to public safety. The TIS should also include proposed improvements to transit within the project vicinity, as well as improvements to alternate modes of travel, i.e; bicycle and pedestrian facilities.

### ***Encroachment Permit***

Any work or traffic control that encroaches upon the State's ROW requires a Caltrans issued encroachment permit. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans indicating the State's ROW must be submitted to the address below:

Office of Permits  
Caltrans – District 3  
703 B Street  
Marysville, CA 95901

Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. Please visit the following URL for additional information: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

Ms. Shirlee Herrington / Placer County  
December 8, 2016  
Page 3

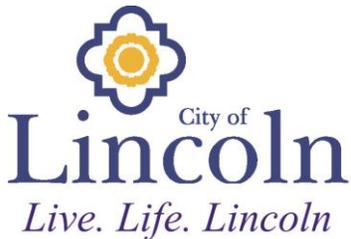
We would appreciate the opportunity to review and comment on any changes related to this development. Please provide our office with copies of any other actions concerning this project.

If you have questions regarding these comments or require additional information, please contact Kevin Yount, Intergovernmental Review Coordinator for Placer, by phone at (530) 741-4286 or via email to [kevin.yount@dot.ca.gov](mailto:kevin.yount@dot.ca.gov).

Sincerely,



KEVIN YOUNT, Branch Chief  
Office of Transportation Planning  
Regional Planning Branch—North



December 16, 2016

via email:cdraecs@placer.ca.gov

County of Placer  
Shirlee Herrington, Environmental Coordination Services  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

**Subject: City of Lincoln Comments on the Sunset Area Plan/Placer Ranch Specific Plan Notice of Preparation**

Dear Ms. Herrington:

The City of Lincoln appreciates the opportunity to comment on the Sunset Area Plan/Placer Ranch Specific Plan ("Proposed Project") Notice of Preparation (NOP). City staff has reviewed the NOP; the City offers the following comments for consideration.

1. The City of Lincoln Public Facilities Element (PFE) identifies the future Fiddyment Road right-of-way to be a six lane arterial roadway from the planned future Placer Parkway to State Route 65. The City of Lincoln requests that environmental impact report for the Proposed Project include a cumulative impact analysis which accounts for planned development and improvements based on the City's General Plan 2050, including the future widening of Fiddyment Road.
2. A portion of the Sunset Area Plan is within the City of Lincoln's Sphere of Influence (SOI), specifically the Special Use District C (SUD-C) area and a portion of Village 6. LAFCO Resolution 2010-10 and associated exhibits (which expanded the City's SOI consistent with the City's General Plan Land Use Diagram) reflects that a portion of the Proposed Project would fall within jurisdiction of the City. In this case, future action which is not identified in the NOP would require annexation into the City of Lincoln. The City wants to ensure that the planned growth in the portion of the Proposed Sunset Industrial Area Project located within the City's SOI is consistent with City of Lincoln development standards and comprehensive development plan, including the requirement that responsibility for future impacts will be the responsibility of future development applicants and/or Placer County. Further, the City of Lincoln should be included as a responsible party.
3. The City of Lincoln currently has a modest amount of light industrial and business professional land uses within its city limits and plans to expand these land use

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City Hall  
600 Sixth Street  
Lincoln, CA 95648  
(916) 434-2400  
[www.ci.lincoln.ca.us](http://www.ci.lincoln.ca.us)

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Administrative Services - City Manager's Office - Development Services  
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types with the City's SOI. The Sunset Industrial Area Plan seeks to intensify business professional and light-industrial land uses by approximately six million square feet within the Proposed Project area. The environmental analysis should consider the impacts to planned projected growth of this sector within the South Placer region to determine if market demand tracks with planned growth, and how market absorption may have unintended consequences to surrounding communities, including the City of Lincoln. The City of Lincoln recommends the preparation of an Urban Decay analysis evaluating market demand, absorption, and how the intensity of planned growth in this sector could affect existing and future business development within the City of Lincoln.

4. The NOP briefly notes transportation and circulation by referencing high volumes of truck and commuter trips. It is recommended that that the planned traffic analysis consider impacts to local feeder streets within the City of Lincoln that would be used as an alternative to State Highway 65, which would include planned Nelson Lane, Joiner Parkway, and Twelve Bridges Drive. Furthermore, project mitigation should include a commitment by the County for transit that would include improved and new transit routes within the City of Lincoln.

The City of Lincoln appreciates the opportunity to provide comments. We look forward to continued discussions and an opportunity to review the draft Environmental Impact Report. Please don't hesitate to contact me at (916) 434-3241 or [Matthew.Wheeler@lincolnca.gov](mailto:Matthew.Wheeler@lincolnca.gov) if you have questions or would like to discuss our comments. In addition, we request that you please keep me and Jim Bermudez, Development Services Manager updated with project related matters.

Sincerely,



Matthew J. Wheeler  
Community Development Director

cc: Michele Kingsbury, Placer County Principal Management Analyst  
Matthew Brower, Lincoln City Manager  
Jim Bermudez, Lincoln Development Services Manager



December 15, 2016

Shirlee Herrington, Environmental Coordination Services  
Placer County, Community Development Resources Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603  
e-mail: [cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov)

SUBJECT: Notice of Preparation (NOP) for the Proposed Sunset Area Plan/Placer Ranch Specific Plan Project

Dear Shirlee:

Thank you for the opportunity to review the Sunset Area Plan/Placer Ranch Specific Plan NOP. Based on the project description provided in the NOP, the 8,358 +/- acre project is located in unincorporated south Placer County, west of the State Route 65. The Placer Ranch Specific Plan (PRSP) is included as part of the proposed Sunset Area Plan and the effort would update the existing community plan, general plan, maps and regulations. The Sunset Area Plan will bring forward new land use designations, including: General Commercial, Entertainment/Mixed Use, Business Park, Innovation Center, Eco-Industrial, Light Industrial, Public Facility and Urban Reserve. The 2,213 acre PRSP is a mixed-use community proposed in the Sunset Area Plan consisting of 5,827 residential units including a 720-unit age-restricted community, an elementary school, middle school, 323.5 acre of neighborhood parks and open space, and 6,356,800 square feet of general commercial, commercial mixed use, and campus park (office, research and development, light industrial and commercial) uses complementary to the university. The proposed university and non-residential land uses of the project are intended as a catalyst for employment-generating development in Placer County's overall Sunset Area

The City of Rocklin has completed its review and would like to offer the following comments:

- 1) The EIR should assess water supply impacts associated with the proposed project, including impacts to groundwater supplies, surface water supplies and those associated with water treatment operations. In particular, the City of Rocklin is concerned about the diminishing availability of surface and ground water in the South Placer region, the ability to supply water for growth which

has already been approved or is in the planning stages for Rocklin, and how diminished surface water supplies may be further exacerbated by additional growth in the South Placer region as contemplated by this proposal.

A thorough analysis of available water supply and all necessary infrastructure improvements (i.e., transmission lines, treatment facilities, pump stations, storage facilities, etc.) to serve the project needs to be provided in the environmental analysis. Should expansion or improvements to existing water supply related facilities and/or infrastructure be required, the environmental impacts of such must be included in the project's environmental analysis. Any off-site infrastructure changes or expansion of existing infrastructure located within adjacent jurisdictions should be clearly described and depicted in detailed maps along with supporting analysis.

- 2) Similar to water supply issues, wastewater treatment capacities are based on land uses currently identified within local jurisdiction's general plans. The concern for this project involves changes to the existing land uses that could significantly impact the ability of wastewater treatment providers to serve Rocklin and the surrounding areas that are currently identified and planned for urbanization.

A thorough analysis of available wastewater treatment capacity and all necessary infrastructure improvements (i.e., transmission lines, treatment facilities, pump stations, etc.) to serve the project needs to be provided in the environmental analysis. Should expansion or improvements to existing wastewater treatment facilities and/or infrastructure be required, the environmental impacts of such must be included in the project's environmental analysis. Any off-site infrastructure changes or expansion of existing infrastructure located within adjacent jurisdictions should be clearly described and depicted in detailed maps along with supporting analysis.

- 3) The EIR should assess traffic impacts associated with the proposed project under existing and buildout conditions, including:
  - increases in traffic on local and regional roadways with mitigation to be addressed at the project-specific level and not through a reliance on a future project or future funding mechanism;
  - level of service impacts;
  - access and parking impacts;
  - impacts to/conflicts with alternative transportation policies, plans, or programs, and
  - affects that a project of this scope and scale may have on current regional transportation infrastructure funding mechanisms and formulas, including but not limited to the SPRTA and Highway 65 Interchange Improvement fee programs.

Of particular concern is how the proposed project could affect traffic operations in and around the City of Rocklin, including but not limited to State Route 65, Interstate 80 in the vicinity of SR 65, as well as street segments and intersections associated with Whitney Ranch Parkway, Sunset Boulevard, Blue Oaks Drive, Park Drive, Stanford Ranch Road and Pacific Street. Of additional concern are potential impacts as a result of the use of parallel routes through the City of Rocklin by cut-through traffic as SR 65 becomes increasingly congested.

Prior to beginning a traffic analysis for the proposed project, the City of Rocklin strongly requests that the traffic consultant contact City of Rocklin Environmental Services staff in regards to the scope of the traffic analysis.

Other transportation-related items to be addressed include:

- how much and what type of alternative transportation modes are included with the project or are needed as potential mitigation measures;
  - would the proposal create impacts to the Lincoln/Sierra College Regional Transit Route and negatively affect the length of ridership times experienced by Rocklin residents ;will the project create additional or accelerated needs for lane widening on State Route 65 and how will the project affect the timing and participate in the funding for improvements to the State Route 65/I-80 interchange especially in light of the recent failure of Measure M, and
  - the traffic analysis should also consider in particular the impact of additional large vehicle traffic (semi-trucks, heavy equipment transport, etc.) associated with construction and operation of planned Industrial development and construction activity generated by the entire project. Due to their lengthy size and typically lower speeds, the large vehicle sector in particular can severely diminish the capacities and efficiencies of regional transportation facilities as well as damage existing infrastructure. This impact should be examined in detail.
- 4) The EIR should assess the project's potential impacts on the capacity of the Western Regional Sanitary Landfill, potential acceleration of the need for landfill expansion, and potential impacts related to compatibility issues given the project's proximity to the landfill and its originally intended buffer area, as well as an increase in already-existing complaints about landfill operations, particularly odors.
  - 5) The EIR should assess any potential effects that the project could have on public services, particularly fire and police services and the potential need for mutual aid from the City of Rocklin Police and Fire Departments, and those of other nearby cities. Concerns regarding these services are particularly magnified given no planned fire station or sheriff substation or law enforcement facility as part of the project.
  - 6) The EIR should assess the project's consistency with County policies, particularly as they relate to directing urban development toward cities and allowing residential and sensitive land uses within close proximity to the existing and future expansion areas of the Western Regional Landfill.
  - 7) The EIR should assess the provision of parkland as it relates to larger, regional facilities and how programmed (formal) and un-programmed recreation will be accommodated within the development area and whether regional and local park facilities and the recreation services that are provided within the City of Rocklin would be impacted by project employees, residents and students.
  - 8) The EIR should assess whether a project of this scope and scale would result in potential increased costs (and any resultant physical change or impact) to current rate schedules for the provision of public services and utilities (e.g., water, sewer, electricity, telephone, cable, solid waste, etc.) for existing residents in adjacent jurisdictions who might be expected to absorb

some of the new costs. The projects should bear the burden of all costs associated with expansion, modification or relocation of existing regional facilities.

If there are any questions regarding these comments, please contact me at (916) 625-5162.

Sincerely,



David Mohlenbrok

Environmental Services Manager

cc: Rick Horst, City Manager  
City Councilmembers  
Marc Mondell, Director of Economic and Community Development  
Laura Webster, Director, Office of Long Range Planning  
Bret Finning, Planning Services Manager



DEVELOPMENT SERVICES – PLANNING DIVISION  
311 Vernon Street  
Roseville, California 95678-2649

December 14, 2016

Shirlee Herrington  
Placer County Environmental Coordination Services  
3091 County Center Drive, Suite 190  
Auburn, CA 95609

**RE: NOTICE OF PREPRATION COMMENTS FOR PLACER RANCH SPECIFIC PLAN AND SUNSET AREA PLAN**

Dear Shirlee,

The City of Roseville has reviewed the Notice of Preparation for a project-level analysis of the Placer Ranch Specific Plan (PRSP) and a program-level analysis of the Sunset Area (SA) Plan Update. Thank you for the opportunity to coordinate on this important project.

It is requested that the County share the traffic scope of work prior to commencement of the traffic study. Per the 1995 City/County Settlement Agreement and City/County Memorandum of Understanding the County shall consult with the City regarding (i.) the type of CEQA document to be prepared; (ii) the models, assumptions, methodologies and projections to be used in analyzing traffic, services and other impacts on the City. In a recent meeting it was mentioned that the County would be sharing technical information during certain milestones, once the work was completed. However, completion of the traffic study, prior to the City's review of the traffic scope of work, could lead to impacts to the project schedule and costs. It is our desire to work together early in the process to reach agreement on the traffic analysis.

The PRSP and the SA project areas are subject to the City/County Settlement Agreement and City County MOU and therefore the EIR should examine the project's consistency with these agreements. Please note that the provisions of the Agreements state that the project must positively demonstrate that adequate surface water, sewer capacity and the necessary distribution and collection systems including transportation exist or can be built to serve the development, and that it has been positively demonstrated that the legal, financial and practical ability to provide a full range of public services exists. The EIR must be prepared and processed in accordance with the terms of these agreements.

It is important that the environmental document adequately address buildout of the future SA, with buildout of the PRSP so that utilities and traffic infrastructure are adequately planned, analyzed and sized. For purposes of utility sizing it is important that the most conservative (i.e., high generating traffic, water, wastewater, recycled water) land uses are analyzed. If residential units are being proposed in the SA expansion area (i.e., within the Entertainment Mixed Use, Innovation Center and potentially within the Urban Reserve), then the most sensitive land uses should be analyzed (land use compatibility, consistency with County's goals and policies, and adequate provision of utilities and services).

In addition to the general comments provided above, the following are more specific comments from various City Departments.

## Planning

1. The project's consistency with County policies should be analyzed. Specifically:
  - a. A shift from the policy that urban development be directed to cities and
  - b. Consideration of allowing residential and sensitive uses within close proximity to the existing and future expansion areas of the Western Regional Landfill.
2. Please make sure that any residential units that will be allowed in the SA and PRSP land use categories are accounted for and clearly listed in Table 1 for purposes of development capacity (e.g. Entertainment Mixed Use, Innovation Center, and University Campus land uses).
3. If there are specific land uses targeted for the Urban Reserve parcel in the SA, these land uses and associated development capacities should be included in the program level environmental analysis.
4. The land use categories described on pages 5 and 8 include a wide variety of similar land uses within each category, many of which have sensitive receptors within each categories (residential, schools, daycares). The combination of land uses with sensitive receptors in proximity to potential sources of hazardous materials may be problematic. For example, residential and school developments are in proximity to research and development, hospitals, laboratories, light industrial, manufacturing and assembly, industry clusters, technology-oriented uses, waste to energy technologies, recovery and reuse of solid waste, solid waste-related research and development, solid and liquid waste (sewer) facilities, and solid waste management/landfill facilities. The EIR should address the proximity of these uses to each other.
5. All required offsite improvements should be analyzed and mitigation identified. All offsite improvements should be clearly identified on an exhibit and proposed service providers clearly indicated. Please refer to the comments provided by the City on the PRSP technical studies (letter dated November 8, 2016). A copy of that letter is attached.
6. The EIR should examine if the City's General Plan noise contours along major roadways will be increased by this project and/or exceed the City's policies.
7. Please analyze land use compatibility to the City's Peaker Plant 2 (e.g, MDR has been placed in closer proximity to the facility than the previous land use plan) which may impose noise impacts on new residents that will require mitigation).
8. The City of Roseville has existing open space preserves south of the PRSP's southwest corner in the West Roseville Specific Plan, as well as open space preserves southeast of the SA's boundary. Please analyze direct and indirect impacts from placing land use immediately adjacent to these preserves, and in the case of the southeast preserve a potential extension of Foothills Boulevard, through the preserve area.
9. The EIR should examine land use impacts on the City of Roseville's existing residents including describing interface impacts (noise, operations impacts, and light/glare impacts, as well as short

term dust and air quality impacts from construction). Mitigation measures should be identified to reduce any impacts.

10. The City has received concerns from the adjacent neighborhoods south of PRSP regarding future development. The County should conduct specific outreach to the surrounding neighborhoods to alleviate concerns. These include the Blue Oaks and Fiddymont Farms Neighborhood Associations and Roseville Coalition of Neighborhood Associations at a minimum.
11. The Light Industrial land use category proposed in the SA indicates that "transitional housing, supportive housing, and emergency shelters would be permitted, but only on publicly-owned lands." Please identify the location of these publicly-owned lands where these uses could potentially locate.
12. A detailed phasing and infrastructure plan should be analyzed.
13. Per the Settlement Agreement, future development should meet the standards and requirements specified in Part II of the County General Plan regarding level of service.

### **Electric**

14. Please address accessibility to the City's Peaker Plant 2 (RPP2). The current access road to the site heads northerly and ties into existing Nichols Road. The location of the gate into the RPP2 is in the northwest corner of the yard and will be blocked by the proposed park. Any relocation of the access point will need to be approved by Roseville Electric with a new access road provided. The access road and driveway entrance will need to be designed so it is capable of transporting a 200,000 pound substation transformer and associated transport trailer. The road and driveway access shall be designed to meet the truck and trailer minimum turning radii (e.g., typical width of the road would be 16 feet).
15. The proposed project will need to maintain access to the existing 60kV overhead line from the Roseville Peaker Plant 2 westerly to Woodcreek Oaks Boulevard. All residential units that are proposed northerly of the existing line will need to be notified that there will be an existing 60kV overhead line in their proximity.
16. The plan shall address the proximity of residential units to the Roseville Peaker Plant 2 (RPP2) as it relates to noise. Preliminary noise analysis has determined that the nearest residential unit must be placed a minimum distance of 789 feet from the RPP2 so the noise level at the residential unit does not exceed 55dB. Sound walls may be utilized to decrease the distance to the proposed residential units.
17. Roseville Electric will want to review the plans from PG&E for their substation for grounding, fault current, step potential, etc. in proximity to the Roseville Peaker Plant 2.
18. Drainage - Any grading surrounding the Roseville Peaker Plant 2 (RPP2) shall be designed so that no drainage shall be directed onto the RPP2 site. The RPP2 may sheet drain onto adjacent property. The developer will need to capture this drainage in their design of the drainage of the surrounding parcels.
19. With the extension of Foothills Boulevard, Roseville Electric will require the installation of electric facilities and street lighting per Roseville Electric final designs at the project's expense for any portion of Foothills Boulevard within the City.

20. The project shall consider public safety on the proposed park site adjacent to the Roseville Peaker Plant 2 (RPP2). Proposed development around the RPP2 may require an upgrade of the existing chain link fence to a block wall at the project's expense.

### **Environmental Utilities**

21. Any wastewater flows must not exceed flows identified in the South Placer Regional Wastewater and Recycled Water Systems Evaluation, RMC, December 2009 (RMC Study). Any flows which exceed those referenced in the RMC Study will need to be evaluated in the Environmental Impact Report.
22. A wastewater metering location will be required for influent flows directed to the Pleasant Grove Wastewater Treatment Plant. The location of this metering facility needs to be identified.
23. All evaluations for wastewater flows must at a minimum include, current, current plus project, and build-out plus project. Any additional capacity requirements above those listed in the RMC Study for the Pleasant Grove Wastewater Treatment Plant will need to be addressed in the Environmental Impact Report.
24. A recycled water metering location will need to be identified and depicted on the land use map. The City of Roseville requests that this be located at the City/Placer Ranch boundary.
25. All potable water connections with the City of Roseville will require metering and may also require additional treatment. If respective service pressures are not equal at proposed connection sites, pressure reducing or pumping stations may be required.
26. If the proposed project would result in additional costs to the Western Placer Waste Management Authority that would then be placed on member agencies (such as Roseville rate payers), then mitigation fees to cover this increase should apply to the proposed project so as to not impact member agencies' rates.

### **Engineering**

27. Given the fact that several important roadway connections will connect to the City of Roseville (Fiddyment Road, Woodcreek Oaks Boulevard, and Foothills Boulevard), the City requests to work with the County's traffic engineers on the development of roadway alignments, roadway sizing, identification of impacted facilities and mitigation, timing of improvements, and a fair share formula to off-set the impacts. It is assumed that the traffic analysis will address SA impacts at a program level and the PRSP at the project level. The analysis should address cumulative buildout.
28. Circulation – Existing roadways within the City of Roseville will serve as major access points to the project area providing opportunity for general vehicular use, transportation of services, as well as alternate modes of transportation. Increased project Vehicle Miles Traveled will likely contribute to local congestion impacts. Traffic signal coordination between the project and the City will enhance traffic flow between jurisdictions. The following identifies those areas of concern that should be addressed within the scope of the Environmental Impact Report analysis:

- a. Impact to off-site roads (existing City of Roseville) - The City will continue to analyze traffic impacts based on a General Plan level of service policy that identifies intersection capacities, pedestrian interface, and lane utilization.
  - i. The circulation analysis should tier off of the City's existing 2035 model and provide a comparison between the no project alternative and the cumulative full buildout of the project area land uses. Impacts created on existing roads "if not but for" the intensification of the SA and the inclusion of PRSP should identify any impacts created by the project.
  - ii. Identification of fair share costs to mitigate impacts should be identified.
- b. Identification of internal and off-site roadway width needs based on average daily trips should be identified.
- c. A plan alignment for Foothills Boulevard should be evaluated considering health and safety/resource impact/congestion/operations/access points/land use compatibilities. If the plan alignment for Foothills Boulevard deviates from the existing right-of-way that has been previously dedicated, any additional acquisition of right-of-way should be evaluated in the EIR and approval by the Roseville City Council would be required. Additionally, any costs associated with the acquisition of additional right-of-way shall be analyzed and funded by the project.
- d. Right-of-way needs for off-site improvements should be identified, and the costs associated with any eminent domain proceedings should be identified as a project impact.
- e. Other circulation considerations – Noise, greenhouse gases, resource impact, hydraulic and storm water management considerations/Vehicle Miles Traveled.
- f. Identification of a Phasing Plan and the timing of infrastructure construction based on need and level of service.
- g. Identification and reservation needs of right-of-way for future "super-cumulative" regional build-out conditions.
- h. Placer Parkway – Identification of right-of-way needs, lane utilization, timing of construction, realignment of Sunset West and interim impact to City streets.
- i. Highway 65 – The project should participate in the Hwy 65 and SPARTA Fee funding programs.
- j. There will be a high travel demand between the plan area and the City of Roseville. In an effort to coordinate and optimize the travel demand and provide the highest level of traffic signal coordination between and across jurisdictional boundaries, a traffic operational management plan should identify responsibilities. A fiber optic communications system should be provided within the plan area to network the operations of the signals. This communications system should include multiple redundant connections to neighboring jurisdictions like the City of Roseville for future coordination and collaboration of traffic operations.

29. Alternate Modes of Transportation – The project should emphasize alternate transportation opportunities that take advantage of reducing Vehicle Miles Traveled and to minimize the use of single vehicle automobiles including easy access to bus stops, comprehensive sidewalk systems, and comprehensive bikeway and trail systems that serve the entire plan area and provide logical connections to existing and future facilities. Complete street design concepts should support pedestrian safety, walkability, and bicycle use as viable transportation forms. The following areas have been identified for inclusion in the environmental analysis:
- a. Local and regional transit – The project should be designed to accommodate the South Placer County Bus Rapid Transit (BRT) Service Plan, planned by City of Roseville Transit, Placer County Transit and future Bus Rapid Transit service as it is anticipated that a future BRT route will traverse through the land plan area. Route selection, designated/jump lanes, locations of transfer points and stops, and special amenities to support the BRT should be identified and analyzed.
  - b. Bikeways – In locations where proposed project bikeways have the opportunity to connect to City bikeways, City staff would like to work together to facilitate connections.
30. Drainage – Portions of the plan area are tributary to the Pleasant Grove and University Creek(s) and drain into and through the City of Roseville. Of chief concern is any impact that the developed land form will have on flood waters effecting land uses and facilities within Roseville. General practice dictates that there will be no increase to the water surface elevations of the 100-year peak flow storm event leaving the site. To assure that drainage impacts are mitigated, the following items should be evaluated:
- a. A fully developed, unmitigated upstream watershed should be evaluated as the basis of flood plain designation, a mitigated upstream watershed mitigating peak flow increases created by development.
  - b. If on-site in-creek detention or detention basins are anticipated to mitigate peak flow increases, the evaluation should describe where these facilities will be located, the quantity of water to be detained, and in the case of the in-creek facilities the culvert designs at the roadway crossings.
  - c. Compliance Points should include the following locations:
    - i. All points where storm water leaves the plan area.
    - ii. The western edge of the Amoruso Ranch Specific Plan confluence into University Creek.
    - iii. The confluence of University Creek and Pleasant Grove Creek.
    - iv. The confluence of the North Branch Placer Tributary and Pleasant Grove Creek.
  - d. Depending on the outcome of the off-site Compliance Points (CPs) and the interaction of the project flows relative to the peaking of Pleasant Grove Creek, additional CPs may be identified.
  - e. For each on and off-site Compliance Point:

- i. Provide a comparison of fully developed unmitigated peak flows versus fully developed mitigated peak flows.
    - ii. Model the off-site tributary areas as fully built, unmitigated.
    - iii. Model University Creek as it currently exists.
  - f. Changes to the 100-year, 24 hour hydrographs (due to detention) and the migration of flow downstream has the potential to affect peak flow timing in both University Creek and Pleasant Grove Creek. For each Compliance Point:
    - i. Provide a comparison of the pre-project and post-project peak flow timing influences relative to the peak timing of the associated creek systems.
    - g. In the event that the project demonstrates the need for volumetric storage as a mitigation for downstream impacts, the analysis should determine the volume requirement and the location for the retention storage facility. If there is a desire to utilize the City's Reason Farms Flood Control project, coordination with the City will be required and the EIR will need to evaluate this concept at a project level. Additionally, in order to address funding, maintenance, etc., a partnership such as a joint powers authority between the City and County will be required.
31. It is important that utility needs are coordinated if needed through the Amoruso Ranch and Creekview Specific Plan areas.

## **Fire**

32. When the County previously considered processing the PRSP, two fire stations were planned as part of the land use plan. The City is concerned that no fire station is planned as part of the proposed project. Land uses are being significantly increased and therefore, the project has the potential to significantly impact City of Roseville fire services and Roseville residents.

## **Police**

33. This plan will increase the need for law enforcement services in and around PRSP/SA. The land use plan does not appear to include a sheriff substation or law enforcement facility within the development. Please address how public safety will be adequately addressed without impacting surrounding jurisdictions. Additionally, City staff is interested in understanding the plan for law enforcement on the proposed campus (e.g., will there be on-site campus police?). Early and detailed coordination will need to occur between Roseville Police Department, Placer County Sheriff's Office, and the new campus police, if planned.

## **Parks**

34. Please confirm that the park acreage shown in the land use plan and as listed in the tables is correct. In previous versions of the land use plans the park locations and sizes appear to be the same, but the total acreage has increased. It is unclear where the additional park acreage is located.

- 
35. Please confirm that the total park acreage meets parkland dedication standards. In doing this, please identify what recreation amenities can be accommodated in the 60 foot wide linear parks and how this is projected to meet parkland dedication standards.
  36. Identify County-wide parkland and identify how programmed/formal recreation will be accommodated within the plan area. Without county-wide or regional facilities, services would flow into Roseville resulting in impacts to the City and its recreation services.
  37. Identify what program elements are to be accommodated in the school/park sites and how use of such planned amenities will or will not impact the neighborhoods immediately adjacent.
  38. Most of the parks are associated with schools. Confirm with the school district their expectation for access to school/park properties. If they do not intend to provide full access for recreational opportunities, the number of parks available to residents and for programmed recreation may be insufficient and may result in an impact to City of Roseville recreational facilities and services.
  39. Library services have not been identified within the plan area. Without appropriate accommodations for these services within the project, Roseville library facilities would be impacted. Please identify on the land use plan where library services will be accommodated.

The City of Roseville is supportive of your proposed projects and looks forward to collaborating with Placer County as the project moves forward. Feel free to contact me at (916) 774-5258 if you have any questions regarding these comments.

Sincerely,



Tricia Stewart  
Senior Planner

Attachment 1 – City of Roseville Comment Letter Dated 11/8/16 on the PRSP Technical Studies

Cc: Michele Kingsbury, Placer County  
Paul Thompson, Placer County  
Roseville City Council  
Rob Jensen, Roseville City Manager  
Kevin Payne, Roseville Development Services Director  
Kathy Pease, Roseville Planning Manager



DEVELOPMENT SERVICES – PLANNING DIVISION  
311 Vernon Street  
Roseville, California 95678-2649

November 8, 2016

Ms. Michele Kingsbury  
Placer County  
75 Fulweiler Drive  
Auburn, CA, 95603

**RE: PLACER RANCH PRELIMINARY COMMENTS**

Dear Michele-

Thank you for the opportunity to review the administrative draft *Project Description, Wastewater, Water, Recycled Water and Drainage Technical Studies* for the proposed Placer Ranch Specific Plan. The City of Roseville supports the project and the regional benefits the university campus will bring. However, given the size of the project and the fact that it shares three miles of a common boundary with the City, it has the potential to significantly impact our services. We look forward to working closely with you as the project moves forward to resolve potential impacts and ensure that the project is a success.

It is our understanding that the reports only addresses the Placer Ranch project and do not address the Sunset Industrial Area (SIA) amendments. The technical studies used the SIA existing conditions as the baseline. The City may have additional comments as the SIA continues with its processing. Further, it is our understanding that the EIR will cover the SIA at a program level and Placer Ranch at a project level. It is important that the environmental document adequately address buildout of the future SIA amendments with buildout of the PRSP so that utilities and traffic infrastructure are adequately planned, analyzed and sized.

As a general comment, it appears that the project will rely on City services and/or infrastructure (water infrastructure, sewer and recycled water, transportation facilities, parks and recreation facilities, and drainage improvements at the City's Regional Stormwater Retention Basin). Please make sure that the project description is clear on where those services and infrastructure improvements are located. An offsite exhibit should be included in the document. If improvements are required, these impacts should be fully disclosed and analyzed in the future environmental impact report.

As you had indicated, the traffic analysis is not available yet. Given the fact that several important roadway connections will connect to the City of Roseville (Fiddymont, Woodcreek Oaks, Foothills), the City requests to work with you and the traffic engineers on the development of roadway alignments, roadway sizing, identification of impacted facilities and mitigation, timing of improvements, and a fair share formula to off-set the impacts. It is assumed that the traffic analysis will address SIA impacts at a program level and the PRSP at the project. The analysis should address cumulative buildout.

### **Parks and Recreation**

1. Page 5, Land Use Table 1. Please confirm that the parks acreage is accurate. In previous plans the park acreage was 44 acres not 72 acres.
2. Linear parks have been noted as being a maximum of 60 feet in width. This has very limited recreation value. Is this part of the overall 72 acre count for parkland credit?
3. No county-wide parks have been identified. While the two school/park sites appear to be bigger, they are nestled into neighborhoods where county-wide/formal recreation would not be as conducive. Without a county-wide or regional site, services would flow into Roseville and will have a large impact to the City. City of Roseville youth and adult recreation programs (need for soccer, baseball, and softball fields) are currently critically impacted. It is likely that future residents of the project will be on sports teams that will use/rely on City of Roseville facilities. This will further impact services.
4. No library services have been identified. Similar to the comment above, the new population would impact Roseville library services. How will this be mitigated?

### **Landfill**

5. Page 7. Distance from the Landfill. There is no discussion regarding the potential landfill expansion area that is currently moving forward. How will the proposed project relate to the planned improvements? What standard is being utilized for the residential setback? How will landfill impacts be mitigated?

### **Transportation**

6. Page 12, Transportation. Please confirm that a requirement of the project will be to dedicate the entire length of the Placer Parkway right-of-way (312-foot corridor, minimum). A cross section of the roadway would be helpful to define the right of way needs.
7. Page 13, First bullet. Please state what the right of way dimension of Placer Parkway through the project area will be.
8. Page 13, Public Utilities and Services. Has the County coordinated with Brookfield Residential/Amoruso Ranch Specific Plan located on the PRSP western boundary, regarding the proposed transportation and utility connections? Please note that the roadway geometry appears a little off on ARSP's Road A connection (southwest corner of PRSP) and discussed in the meeting on November 2, 2016. .
9. The City has not had recent discussions with the County regarding the extension of Foothills Boulevard. In the past the County has preferred the western alignment. Please note that this alignment would require acquisition and/or condemnation of property within the City of Roseville. The document should identify condemnation as a potential impact of the project. In addition, this alignment would impact a city-owned wetland open space preserve.

## **Electric Facilities**

10. Page 3 PRSP Site Characteristics. This section includes a description of the existing electric facilities on the project site. After the sentence "Near the southeast corner of the site, the City of Roseville owns and operates Roseville Power Plant 2 (a peaking facility), which is used to generate electricity during peak demand hours." (Strike out "during peak demand hours") The following should be added: "Roseville Power Plant 2 is currently accessed from Nichols Drive. A City of Roseville owned 60kV with 12kV under-build and fiber line extends from the Roseville Power Plant 2 on the adjacent property westerly to Woodcreek Oaks Boulevard."

### 11. Section 6.1 – Residential Units – Page 7

Please note that the City of Roseville's Roseville Power Plant 2 is a high noise generating use. As proposed, new residential uses are proposed closer to this facility, than was proposed in earlier versions of the land use plan. It is recommended that the land use plan be revised to provide a greater separation between the facility and the residential uses. As an example, residential land uses within the City of Roseville were designed with a berm and adjacent open space buffer in order to reduce noise impacts.

The project description should identify "Distance from Roseville Power Plant 2" and all residential units should be located a minimum of 789' feet from the Roseville Power Plant 2 so that the maximum decibel level at the units does not exceed 55db."

### 12. Section 8.0 Public Utilities and Services – Roseville Power Plant 2 – Page 15

Remove "... during peak hours." From the first sentence.

### 13. Section 9.0 – Off-site Improvements – Page 17

Add a bullet item under Dry Utilities that states: "Installation of City of Roseville Electric improvements and street lighting along the extension of Foothills Boulevard within the City of Roseville property boundary will be required."

## **Utilities**

14. Please make clear that wastewater treatment will be provided by the Pleasant Grove Wastewater Treatment Plant operated by the City of Roseville on behalf of the South Placer Waste Water Authority. Placer Ranch proposes to discharge wastewater flows into two existing Roseville trunk sewers that will convey flows to the treatment plan.

### 15. Page 14, Section 8.0, Recycled Water

A recycled water metering facility needs to be included in discussion. The location shall be at the point of custody transfer at the County and City of Roseville boundary.

### 16. Page 16, Section 9.0, Infrastructure, Item 1.

Why is Item 1 even being considered? Does PCWA agree with this suggestion? An agreement with the City of Roseville would be required assuming the City is open to this alternative. This would need to be incorporated in the final utility plans.

- 
17. Add Item 7. Potential expansion of the City of Roseville's north zone recycled water pumping station and associated storage.

### **Sanitary Sewer Master Plan Comments**

Please note: No review of calculations or flows in any of the documents has been reviewed or approved by the City of Roseville Environmental Utilities Department, with the exception of sanitary sewer flows conveyed to PGWWTP.

18. Page 12. The Sanitary Sewer Master Plan states generated flows from Placer Ranch will be 2.05+/- MGD ADWF. The 2009 South Placer Regional Wastewater and Recycled Water Systems Evaluation (2009 System Evaluation) estimated the sewer flows from Placer Ranch to be 1.27 MGD ADWF. The Placer Ranch Sanitary Sewer Master Plan exceeds the estimated flows by 0.78 MGD ADWF. This additional flow will need to be fully analyzed in the EIR by following the guidelines contained in *Chapter 7: CEQA Analysis to Support SPWA Regional Wastewater Service of the 2009 System Evaluation*.
19. The Sanitary Sewer Master Plan states an additional 1.127+/- MGD ADWF of SIA off-site wastewater flows will be conveyed through the area. Please define if these flows were included in the 2009 System Evaluation or if these are additional flows. If these are estimated increased flows from the SIA, the EIR will have to address potential impacts from these flows.
20. A comparison of estimated flows to current capacity of the Pleasant Grove Wastewater Treatment Plant (PGWWTP) is not a valid argument for the Sanitary Sewer Master Plan. These estimated flows must be evaluated at build out conditions to ensure total flows do not exceed ultimate capacity of the PGWWTP.
21. Page 14, 5<sup>th</sup> paragraph. Revise as follows: "Sanitary sewer collection services would be ..." The Pleasant Grove Wastewater Treatment Plant (PGWWTP), is operated by the City of Roseville, located three miles southwest of the PRSP...
22. Exhibit A, B, and C creek crossing details are inconsistent. Exhibit A depicts a 30" sewer line extending to the existing 30" sewer stub, Exhibits B & C depict a 27" sewer line connecting to the existing 30" stub.
23. Page 15, first paragraph. Please delete "Preserve" from the title of the Al Johnson Wildlife Area. It is not a preserve.

### **Recycled Water Master Plan**

24. Page 1: 1.2 Background, 3<sup>rd</sup> paragraph, 2<sup>nd</sup> sentence; times of delivery will be determined by the City of Roseville whereas not to impact the current City of Roseville recycled water customers.
25. Page 1; 1.2 Background, 3<sup>rd</sup> paragraph, 3<sup>rd</sup> sentence; the north zone tank and pump station will need to be evaluated to determine if additional storage or pumping capacity will be required to serve Placer Ranch recycled water demands.
26. Page 13: 4.2 Storage Tank and Pump Station, 5<sup>th</sup> paragraph, last sentence; Same comment as above, the storage and pumping capacity of the City of Roseville recycled water distribution system will need to be evaluated to include Placer Ranch demands.

- 
27. General comment, recycled water custody exchange meter shall be located at the County and City of Roseville boundary and constructed by Placer Ranch.

### **Water Conservation Plan**

28. Table 1 – The total number of units is calculated incorrectly. The total should be 5,827 and not 5,677.
29. Page 6 – There are assumptions for Roseville City Schools on the amount of landscape water demand there will be. Has this been confirmed with the school districts?

### **Storm Drainage Master Plan**

It is important that the project achieve no net increase of peak flows leaving the Placer Ranch project site and entering the City so that downstream properties are not impacted. In addition, drainage has been a very controversial issue to existing County residents in the area, as well as Sutter County. Typically, the City evaluates a fully developed, unmitigated upstream watershed as the baseline flood plain designation, and requires development to maintain upstream watershed flow that mitigates for peak flow differences created by development.

The SDMP includes on-line in-creek detention, detention basins to mitigate peak flow increases, and concludes that there is no net increase in flow entering the City at CP#1, and CP#2. Although we support the concept of on-line in-creek detention, and detention basins, there are few specifics cited in the report or within the exhibits to describe where these facilities will be located, the quantity of water to be detained, and in the case of the in-creek facilities the culvert designs at the roadway crossings.

Additionally, any change in the 100-year, 24 hr hydrographs and the migration of flow downstream has the potential to affect peak flow timing in both University Creek and Pleasant Grove Creek. The SDMP has not adequately addressed the potential of this occurrence.

To address these concerns, we request the following;

30. Cite the topography used for developing the SDMP within the Report.
31. Include those parts of the tributary drainage sheds east and north of PR and within the SIA and model as fully developed unmitigated.
32. Expand the study to include additional Compliance Points off-site from the property to include;
- a. The western edge of the ARSP confluence into University Creek
  - b. The confluence of University Creek and Pleasant Grove Creek
  - c. The confluence of the North Branch Placer Tributary and Pleasant Grove Creek
  - d. Depending on the outcome of these compliance points and the interaction of the project flows relative to the peaking of PGC, additional CP's may be identified.
33. For each CP;
- e. Provide a comparison of the pre-project and post-project peak flow timing influences relative to the peak timing of the associated creek systems.
  - f. Provide a comparison of fully developed unmitigated peak flows vs fully developed mitigated peak flows.
  - g. Model the off-site tributary areas as fully built, unmitigated.

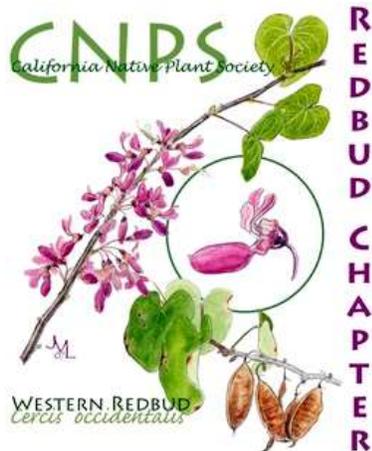
- 
- h. Model University creek as it currently exists.
34. Describe 100-year volumes to be detained, duration of detention, basic and detailed design parameters, culvert sizing, and hydrographs for the flow leaving the detention facilities.
35. Additions/edits to the exhibits;
- i. Plate 1 – Expand Plate to include the sub sheds within the SIA, show the Major shed break line (between University Creek and the north Branch Placer Trib.)
  - j. Plate 2 – Expand Plate to include the sub sheds within the SIA
  - k. Plate 3 - Expand Plate to include the sub sheds within the SIA, show the Major shed break line (between University Creek and the north Branch Placer Trib.)
  - l. Plate 4 – Expand Plate to include the sub sheds within the SIA, include topo, indicate where detention will occur, the amount of storage detained, and the sizing of culverts that create detention.
  - m. Plate 5 – Update plate to depict the offsite reaches of PGC and University Creek and show the CP references above.
36. The analysis should include cumulative impacts to drainage from buildout of the entire project area (SIA and PRSP)
37. City staff did not review anything related to the State required MS4 permit conformance and only looked at flooding impacts within the City.
38. The SDMP indicates that the Project's volumetric storage requirement is 315.15 Acre Feet, and that the location for the retention storage has not been determined yet. If there is an inclination that any part of the City's Reason Farms Flood Control project will be utilized for storage purposes, discussions with the City should begin as soon as possible. Additional modeling efforts may be required.
39. As indicated previously, the City is open to working with Placer County to accommodate storage needs. However, the City will need to rely on the PRSP EIR to fully describe the proposed volumetric storage improvements (dimensions, depth, of rehabilitated University Creek, size of retention basin requirements likely needed in the North Basin, depth of grading needed to accommodate the storage needs etc.)
40. Page 9: Modeling Parameters: The engineer references the PCFC&WCD Stormwater Management Manual, West Placer Storm Water Quality Design Manual, Placer Ranch Land Use Plan, and "other readily available off the shelf sources". Please ask the engineer to be specific when citing their resources.

As we discussed, it would be very beneficial to set up standing monthly meetings so that we can share information in a timely manner. Feel free to contact me if you have any question regarding these comments at (916) 774-5434. We look forward to continuing to work with you as the project moves forward.

Sincerely,



Kathy Pease  
Planning Manager



December 16, 2016

Placer County  
Community Development Resources Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

Attn: Shirlee Herrington, Environmental Coordination Services

Re: Sunset Area Plan/Placer Ranch Specific Plan NOP (Notice of Preparation) Scoping Comment

Dear Ms. Herrington:

These comments are submitted on behalf of the Redbud Chapter of the California Native Plant Society ("Redbud") and Save the Auburn Ravine Salmon and Steelhead (SARSAS). We appreciate the opportunity to comment on the Sunset Area Plan Update and the Placer Ranch Specific Plan.

As one of 34 local chapters of the California Native Plant Society ("CNPS"), Redbud works to protect the native plant heritage of Western Nevada and Placer Counties and to preserve its flora for future generations. With over 10,000 members statewide, CNPS promotes sound plant science as the backbone of effective protection for natural areas. We work closely with decision-makers, scientists, and local planners seeking well-informed and environmentally sound policies, regulations, and land management practices. For more than 20 years, Redbud has actively worked to conserve the rich and diverse native plant communities of western Nevada and Placer counties, and to celebrate the beauty of our local flora. Redbud has published two comprehensive, well-respected books featuring over 700 of the annuals, perennials, trees, and shrubs native to our area; sponsored public presentations on a wide variety of topics, including the Placer County General Plan; promoted gardening with local native plants to conserve water and provide wildlife/pollinator habitat; and worked to conserve rare native plants and important habitat.

SARSAS focuses on Ecosystem Restoration for three major watersheds, Auburn Ravine, Markam Ravine and Coon Creek. SARSAS works to preserve habitat for fish and the numerous wildlife species that utilize the streams and adjacent riparian and upland habitats. The Mission of SARSAS is trying is to make the entire length of the Auburn Ravine navigable for Anadromous Fish – specifically Steelhead and Salmon. The health and well-being of Salmon is directly linked to that of people. If we improve and protect the health and well-being of Salmon, we improve and protect the health and well-being of mankind and therefore ourselves.

Salmon are as resilient and adaptive as humans; when they can no longer adapt, neither can mankind. Save Auburn Ravine Salmon and Steelhead (SARSAS, Inc.) is a 501C3, tax exempt, public benefit corporation with EIN 80-0291680.

This letter is intended to highlight the following areas of concern that need to be addressed in the Environmental Impact Report for the Sunset Area and Placer Ranch Specific Plans:

**\*The Environmental Impact Report required by the California Environmental Quality Act should be developed jointly with an Environmental Impact Statement mandated under the National Environmental Policy Act because Federal and State agencies both have jurisdiction/authority in this matter.**

**\*The EIR/EIS must include full information on the existing conditions and the impacts of the proposed development of the Sunset Area and Placer Ranch, and must conduct multiple comprehensive surveys and evaluations, during several different seasons, of the following:** flora and fauna; wetlands, vernal pools, and streams; hydrology; geology; storm drainage; air quality; water quality; and potential pollution/other impacts from existing land fill and other local land use. All surveys, assessments, mapping, and data compilation and presentation should be done in accord with applicable scientific standards, methods, and criteria consistent with requirements of NEPA, ESA, CWA, CEQA, CESA, CNPPA, PCCP, and the Placer County General Plan and draft conservation plans.

**\*The EIR/EIS must perform on-the-ground surveys throughout the year to determine if perennial or seasonal wetland streams in the Sunset/Placer Ranch area support rare or endangered species and support or have the potential to support salmon and steelhead.**

**\*The EIR/EIS needs to evaluate the impact of the proposed project on open space and “buffer zone” requirements, and on protections for farmlands.**

### **Overview**

The Sunset Area Plan encompasses 8,358 acres; at present almost 90% of this area remains undeveloped. As noted in the Opportunities and Constraints Report (“OC Report”), “virtually all of the Sunset Area [including the Placer Ranch Area] is within a Federally designated vernal pool recovery core area” (p. 23). This designation was made as part of a recovery plan for rare vernal pool species published by the US Fish and Wildlife Service (USFWS) in 2005. The recovery plan designated critical habitat for 15 species, including 4 vernal pool crustaceans and 11 vernal pool native plants. (Existing Conditions Report (“EC Report”), page 5-42.)

Whether or not prior comprehensive on-the-ground biological surveys have been done of the Sunset Area,

it is essential that they be done now to evaluate the status of (a) the Federally listed endangered fairy and tadpole shrimp and other rare species in its vernal pools (See OC Report, p. 23; EC Report, page 5-40); (b) the rare species listed in the Existing Conditions Report (e.g., Swainson's hawk, white-tailed kite, and burrowing owl), which include one fully protected species, four threatened species, and 15 species of "special concern" and determine whether there are other protected species in the Area (EC Report, pages 5-38 to 39); and (c) the 12 rare native plants identified in the Existing Conditions report and determine whether other rare plants present in the area. (EC Report, page 5-41.)

Vernal pools are a unique natural resource, and are among the most fragile yet biologically diverse habitats in California. Many of the plants and animals native to vernal pools are also endemic to the vernal pool habitat and occur nowhere else. Vernal pool habitat is of critical concern, because it is estimated that in the past 150 years, over 90% of California's vernal pools have been filled and converted to agriculture, housing, and urban development.

A complicated set of Federal, State, and local environmental laws and regulations now protect vernal pools and other wetlands, because of the critical importance of these ecosystems to water quality, carbon sequestration, and flood protection, and because they support wide range of specialized habitats and animal and plant communities, including many rare species. "Wetlands are the transitional area between terrestrial and aquatic system and specialized fauna provide breeding, rearing and feeding habitat for many fish and wildlife, as well as natural flood protection and pollution control." (EC Report, page 5-15.)

The vernal pool recovery core area identified within the Sunset Area includes 1,360 acres (20%) characterized as "high density" Vernal Pool Complex ("VPC") [VPC includes vernal pools, seasonal wetlands, and seasonal swales.] Another 1,382 acres (21%) is characterized as "intermediate density" VPC, and 3,872 acres (59%) is "low density" VPC. The VPC "low density" characterization includes fewer vernal pools and larger amounts of seasonal wetlands or seasonal swales, and reflects the large amount of annual grassland and pasture that have an "appreciable" vernal pool ecological function. (OC Report, pages 5-29 to 5-35.)

Under the Clean Water Act (CWA) and other environmental protection laws, the development or disturbance of wetlands is highly restricted; wetlands must be avoided and preserved. Habitats of listed and/or protected species of animals or plants also must be avoided and preserved. An EIR/EIS relating to wetlands or protected species and habitat must provide an alternative for complete avoidance in addition to any alternatives that include "taking" and mitigation.

If wetlands cannot be avoided, they still may not be filled in or developed unless a permit is issued by the US Army Core of Engineers, and there must be extensive mitigation to ensure that any remaining or new sites are fully viable. Mitigation can include preservation, enhancement, and/or creation of new wetlands in another suitable site. The EIR must include an evaluation of what mitigation strategies will best preserve the protected species and habitat. Research on vernal pool mitigation efforts such as creating new vernal pools off-site or preserving isolated vernal pools in place but surrounded by development, has shown that both have been largely unsuccessful for a variety of reasons, with poor results over the long term. See Report of the Science Advisors (2004), Placer County Natural Community Conservation Plan/Habitat Conservation Plan Phase One.

The Notice Preparation of a Draft Environmental Impact Report ("NOP") describes a development vision for the 8,358 acre Sunset Plan Area (which includes the 2,213 acre Placer Ranch Specific Plan), and indicate

that the Placer Ranch site will include:

- \*5,827 dwelling units on 764 acres, almost half of which are low density residential;
  - \*Over 9 million square feet of commercial, mixed-use, campus park, and university-related developments, including large scale commercial centers, office developments, restaurants, entertainment, medical offices, hotels, and similar uses on 771 acres;
  - \*72.6 acres of parkland, and
  - \*251 acres of permanent open space that could include “fire/fuel modification zones,” “mowing, grading and construction activities,” pedestrian and bike paths, storm drainage, utility crossings, etc.
- There will also be Eco-Industrial areas (e.g., industrial & manufacturing uses focused on alternative waste-to-energy technologies); light industrial areas; schools; and public facilities and offices. (NOP pages 9, 10, and 11.)

The Existing Conditions Report states that approximately 1,000 acres (12%) of the Sunset Plan area is preserved as permanent open space in three existing conservation reserves, and the Sunset Plan identifies an additional 1,300 acres adjacent to these reserves as a possible “reserve acquisition area.”

A number of federal, state, and local laws and regulations apply to potential development on the Sunset Area and Placer Ranch Sites, including:

**Federal**

**Local**

- \*U.S. National Environmental Policy Act (NEPA)
- \*Placer County General Plan (PCGP)
- \*U.S. Endangered Species Act (ESA)
- \*Placer County Conservation Plan (PCCP) (Draft)
- \*U.S. Clean Water Act (CWA)
- \*Placer County Aquatic Resources Plan (CARP) (Draft)
- \*U.S. Migratory Bird Treaty Act (MBTA)
- \*Western Placer County Habitat Conservation Plan (WPCHCP) (Draft)

**State**

- \*California Environmental Quality Act (CEQA)
- \*California Endangered Species Act (CESA)
- \*California Native Plant Protection Act (CNPPA)
- \*California Fish & Game Code (CFGC)

**Concerns:**

**The Environmental Impact Report (California Environmental Quality Act) should be developed jointly with an Environmental Impact Statement (National Environmental Policy Act) because both Federal and State agencies have jurisdiction and authority in this matter.**

NEPA and CEQA share similar purposes, standards, and review processes, and both recommend joint EIS/EIR review when a project requires both Federal and state approvals. “[I]n such case, a joint review process can avoid redundancy, improve efficiency and interagency cooperation, and be easier for applicants and citizens to navigate. ... Federal, state and local agencies have cooperated in the environmental review of projects ranging from infrastructure to renewable energy permitting. As the state and Federal governments continue to pursue shared goals, there will be a continued need for an efficient, transparent environmental review process that meets the requirements of both statutes.” Draft Handbook, March 2013 -- *Combined NEPA and CEQA review in one EIS/EIR: Integrating State and Federal Environmental*

*Reviews.*

[https://ceq.doe.gov/publications/NEPA\\_CEQA\\_Draft\\_Handbook\\_March\\_2013.pdf](https://ceq.doe.gov/publications/NEPA_CEQA_Draft_Handbook_March_2013.pdf)

Joint review is particularly important in this case because of the number of state and federal agencies and laws involved. In addition to issues relating to protected habitats and species, there are also federal and state regulations regarding air quality; waterways and flood risks; greenhouse gas emissions and climate change; clean water and water quality issues; and others.

The Notice of Preparation states “Placer County is currently working on the PCCP, which would streamline the permitting process by allowing Placer County and the City of Lincoln to extend state and federal permit coverage to public and private projects. The proposed PCCP is a Habitat Conservation Plan (HCP) under the Federal Endangered Species Act and a Natural Community Conservation Plan (NCCP) under the California Natural Community Conservation Planning Act. As proposed, the PCCP would include the County Aquatic Resources Program (CARP) permit coverage for covered activities under the Program related to the Federal Clean Water Act and the State’s Porter-Cologne Water Quality Act.” (NOP page 13.)

The NOP states that the EIR will provide a complete analysis of several issues, including potential impacts to cultural resources, but does not state that the EIR will survey and analyze existing native plant and animal species and their habitats, as well as “aquatic” features such as vernal pools, riverine/riparian areas, marshes, and ponds. This is despite acknowledging that “given the proximity of riparian creek corridors, special-status plant or wildlife species could potentially occur in the project area” and that “implementation of the proposed project could result in *disturbance or take of special status species or removal of suitable habitat for these species or interference with wildlife movements.*” [Emphasis added.] (NOP page 13.) Rather than make it clear that the EIR will provide the mandated complete analysis of issues arising under NEPA, ESA, CEQA, CESA, CWQ, CNPPA, and other Federal and State laws, the NOP states only that the EIR will “*discuss the status of the PCCP and the project’s compliance with anticipated policies*” [Emphasis added]. Does the term “anticipated” policies refer to County ordinances and policies? If so, these do not yet exist; the County’s Conservation plan, under which such a review would take place, *has not yet been approved by either Federal or State agencies.*

It is imperative that there be a complete analysis of all issues pertaining to protected species and habitat, in compliance with Federal and State laws; the best way to ensure that this responsibility is met is through combined EIR/EIS review. The “full review” and “complete analysis” required by the EIR/EIS cannot be delegated to internal County review processes, especially when *the County is the applicant* and the review process does not yet exist and does not have Federal/State approval.

Joint EIR/EIS review will help ensure that regulatory requirements are met, communication is clear, the review process is complete, and confusion or conflicting decisions can be reduced or avoided. It will also clarify the authority of the County under the PCCP, the Western Placer CARP.

**The EIR/EIS should include full information on the existing conditions, the expected impacts of the proposed development and mitigation, as well as the cumulative effects of this and other projects and changes in Western Placer County, including but not limited to a detailed analysis and assessment of the biology, hydrology, and geology of the unique vernal pools and wetlands in the path of the proposed development; and the number, locations, types, sizes, and health of these vernal pools and wetlands.**

#### Protected Rare Species and Habitats

In 2004, a Report of the Science Advisors was submitted to Placer County on “Planning Principles, Uncertainties, and Management Recommendations” (“Science Report”) in connection with development of the Placer County Conservation Plan, which is still under development twelve years later. This Report

stated that native plants of vernal pools “are characterized by a high proportion of plants that are endemic or regionally restricted to that habitat, and many species are of conservation concern. Studies have identified 56 genera and 200 species of vascular plants known to grow within vernal pools ... more than 70% are native annuals. Nearly 70% are endemic, and 1/3 (73 taxa) are considered endangered.” In addition, it was reported that “Most vernal pool plants are pollinated by native, ground-nesting, solitary bees ... Many of these bees are quite specialized and take pollen from only a single genus of plants.” (Science Report, pages 30-31). Recently, there has been a steep decline in many pollinator populations, including native bees. The EIR/EIS must not only survey native plants and vertebrate animals of the Sunset and Placer Ranch area, but also invertebrates such as fairy and tadpole shrimp and native bees – without the bees, the plants will not survive because they will not be pollinated.

The NOP and the Placer Ranch Specific Plan propose the destruction of up to 2,200 acres of existing vernal pool complex and grassland habitats and the taking of thousands of native animals and plants (many endemic), to be replaced with residential units, commercial businesses, industry, and roads — not even the open space and parks proposed for the Placer Ranch development appear to include preservation of any vernal pool complex habitat. Additional vernal pool complex and farmland acreage is slated for development, which would involve additional taking of native species and destruction of existing habitat.

The 2004 Science Advisors Report stressed that “the creation of new vernal pools in mitigation banks is of marginal long-term conservation value at best. Rather, effective conservation must focus on the protection of archipelagos of pools containing [many] pools and pool types plus a substantial portion of the surrounding catchment area. ... A vernal pool conservation area must include a significant amount of surrounding drainage basin or sub-watershed. ... [R]eserves of less than several thousand acres will be ineffective in conserving all the components of the vernal pool ecosystem.” (Science Report, page 32.) In fact, the current Sunset Area property is ideal for the preservation of existing vernal pools and their associated plant and animal communities, with farm and pastureland predominant and only about 10% of the area developed. If the development goes forward as planned, not only will more than a third of the current vernal pool and wetland habitat be destroyed, but it is unlikely that mitigation will be successful because the size of the reserve is inadequate even with the addition of 1,300 acres.

Moreover, the geology, hydrology, flora, and fauna of individual Placer County vernal pools varies widely; it is critical to have specific data about each of the factors to evaluate the impact of development and the nature and costs of mitigation strategies that will work. Mitigation of vernal pools is extremely complex and difficult to achieve, and the associated costs are very high. These high costs of mitigation must be figured in to the “value” of vernal pools as “replacement value.” For a detailed description of the complex and lengthy process of establishing viable vernal pools as mitigation for development, see *Improving Wetland Restoration Success*, 2014-15 Webinar Series of the Association of State Wetland Managers, [http://www.aswm.org/pdf\\_lib/restoration\\_webinar/vernal\\_pool\\_restoration\\_042115.pdf](http://www.aswm.org/pdf_lib/restoration_webinar/vernal_pool_restoration_042115.pdf)

In a study of mitigation of vernal pools in Sacramento and Western Placer Counties, researchers found “most development projects impacting vernal pools conduct at least a portion of their mitigation requirements at a site with similar edaphic settings. However, when examined at a landscape-scale across all development projects, the more common edaphic settings such as Northern Hardpan and Low Terrace pools are increasing while more rare types such as Northern Claypan and Volcanic Mudflow pools are decreasing. Results also show that Drainageway pools, a less-specialized pool type with generally lower species richness, are becoming more common through mitigation.” *Changes in vernal pool edaphic settings through mitigation at the project and landscape scale*, Matt Wacker and Nina M.

Kelly, Wetlands Ecology and Management 12: Vol. 3 pp. 165-178, 2004. (Study of vernal pool mitigation in Sacramento and western Placer Counties.)

In other words, most mitigation strategies fail in the long term, and even those with some success resulted in reduction in rarer types of vernal pool and their associated flora and fauna, and an increase in more common types. It is for this reason that avoidance of disruption/destruction of vernal pools, especially those providing habitat for endangered species, is required unless it cannot be avoided, and even then, there must be thorough environmental review, approved permits, and the employment of mitigation strategies that will actually mitigate and preserve what has been lost to development.

The Existing Conditions Report highlights a proposed “Reserve System” that, once created, would “provide a means for protecting, managing, enhancing, and restoring or creating the natural communities and habitats that support 14 species that are proposed for coverage under the Plan, including the vernal pool fairy shrimp, vernal pool tadpole shrimp, Swainson’s hawk, and other specie known to occur in the [Sunset Area and Placer Ranch Specific Plan Area]. The Reserve System will mainly be located in the western and northern Valley [outside of Placer County?] and in the northern Foothills [also off-site?], regionally separated from future urban and suburban growth. ... Preservation, restoration and creations of wetlands will specifically provide in-kind compensatory [sic] in order to achieve conservation of the covered species and no overall net loss of wetland habitat through the term of the permit.”... *“One of the key objectives of the PCCP is to shift regulatory responsibility from state and federal agencies to the local jurisdictions (Placer County and the City of Lincoln).”* [Emphasis added.] (Existing Conditions Report, page 5-58.) The Existing Conditions Report states that the Western Placer County Habitat Conservation Plan “is intended to establish preservation and development areas that address Federal and State permitting and preservation requirements.” This Conservation Plan, however, does not yet exist, and, in any event, it would not relieve the county of the requirement of preparing a full EIR/EIS and meeting state and federal permitting requirements.

**Prior surveys have not been specific, comprehensive, and/or scientific.**

The Existing Conditions Report summarizes work previously done under the PCCP to “map” land cover/habitat types: “Land cover for the PCCP was mapped using aerial photography. The PCCP uses the term constituent habitat to describe habitat elements within land cover types that cannot be mapped and measured directly using aerial photography. Constituent habitats comprise wetlands and riparian vegetation that are subject to mapping protocols defined in regulation that require ground level access and detailed cartography that is not available uniformly throughout the PCCP Plan Area. The PCCP analysis of these constituent wetland and riparian habitats is based on estimates of their presence in the various land cover types.” (Existing Conditions Report, page 5-29.) ... “[Vernal pool type wetlands] were mapped for the PCCP at the coarse scale of the vernal pool complex for purposes of regional conservation planning. Mapping at this scale, however, did not distinguish between types and sizes of pools/seasonal wetlands. Where a vernal pool complex is mapped, it includes vernal pool type wetlands and surrounding upland.” (Existing Conditions Report, p. 5-33).

In the EIR/EIS, like the PCCP, full information would require ground level access and detailed cartography during multiple seasons so that the size and extent of existing vernal pools and other seasonal wetlands can be understood and more accurately mapped; such information is essential to understand the impact of the proposed project and, if these sensitive areas cannot be avoided, evaluate proposed alternative mitigation proposals. In addition, full information would require an evaluation of the biotic/biological resources, as part of the environmental review process, conducted by a wildlife biologist or similarly qualified person, as provided in Placer County policy. (Opportunities and Constraints Report, p. 23.

In summary, the preparation of the EIR/EIS must include comprehensive on-the ground survey, assessments, and analysis of biology, hydrology and geology of vernal pool complexes and other seasonal or non-seasonal streams, wetlands & swales in the Sunset Area need to be surveyed; how many features, where located, how large, how diverse their individual native plant and animal communities are, and any concerns about viability or status:

- A. Include flora and fauna of the entire Sunset Area and Placer Ranch (including review of prior biological surveys/assessments)
- B. Identify species, establish population sizes and health of each population, and associate populations with specific vernal pools, wetlands and/or streams
- C. Conduct surveys at multiple times during the year because of the varying seasonal life cycles of flora and fauna, and the fact that some fauna are migratory and/or use the habitat for foraging without living within the Sunset area
- D. Identify native plants in vernal pool complexes, riparian areas, grasslands, and pastures, and review of impacts and possible mitigation under California Native Plant Protection Act as well as other State and Federal laws.
- E. Map and compile data on the location, size, persistence, and specific geological characteristics and topography of each vernal pool and other seasonal and permanent wetlands and streams in the area; data must be collected multiple times during the year because of seasonal variations.
- F. Determine baseline hydrology, storm runoff, seepage, and groundwater measurements of vernal pools and other seasonal wetlands using appropriate scientific methodology and regular monitoring, evaluate existing habitat and determine appropriate mitigation, should mitigation become necessary.

In addition, the EIR/EIS must address more general issues related to water quality, air quality, greenhouse gases, pollution, storm drainage, and flood risk issues, including permitting requirements from USACE or other agencies, in the current context, during construction, and after build-out (e.g., large areas covered by buildings, pavement, and cement; vehicle traffic; changes in drainage and topography)

For additional details on analyzing and restoring native wetlands, see *Improving Wetland Restoration Success*, 2014-15 Webinar Series of the Association of State Wetland Managers, [http://www.aswm.org/pdf/lib/restoration\\_webinar/vernal\\_pool\\_restoration\\_042115.pdf](http://www.aswm.org/pdf/lib/restoration_webinar/vernal_pool_restoration_042115.pdf)

**\*The EIR/EIS must include on-the- ground surveys throughout the year to determine if perennial or seasonal wetland streams in the Sunset/Placer Ranch area support rare or endangered species and support or have the potential to support salmon and steelhead.**

There are numerous wetlands, waterways, vernal pools, streams and creeks throughout the SIA/PR area. Waterways within the SIA/Placer ranch are within the Auburn Ravine Watershed. The EIR must perform an on the ground survey to determine if the perennial or seasonal wetland streams in the SIA/PR area support rare or endangered species and support or have the potential to support salmon and steelhead. Surveys must be undertaken throughout the year, as populations are migratory. As th SIA/PR site is rich in wildlife and fragile ecological values, SARSAS will resist any proposal to allow project proponents to contribute to off-site mitigation in lieu of avoidance of wetlands and waterways. If the proposed alterations to wetland and riparian habitat or to drainage and hydrological elements associated with the waterways have the potential to have short or long term impacts to fisheries and the species upon which they prey, these must be carefully analyzed and avoidance and preservation is the recommended

approach over any mitigation. Any activity to remove, fill or hydrologically interrupt wetland or riparian area function, or any activity that has the potential to affect populations of special status species or create disturbance or removal or suitable habitat for these species or interference with their movement must be avoided. See attached letter from Jack Sanchez of Save Auburn Ravine Salmon and Steelhead (SARSAS).

**\*The EIR/EIS needs to evaluate the impact of the proposed project on open space and “buffer zone” requirements and policies, and on protections for farmlands.**

Research confirms that open space and “buffer zones” are essential to conservation and to the creation and maintenance of viable natural preserves. The EIR/EIS needs to review the Sunset and Placer Ranch projects to ensure they comply with state, federal, and local requirements for buffer zones and open space. In addition, this project proposes to eliminate large areas of “Important Farmland” – farmland has been shown to have great value to wildlife habitat in that it creates open space and de facto buffer zones that insulate wildlife and flora from human and vehicular traffic, provide sources of food and shelter, and mitigate some of the effects of development.

**Conclusion**

The Redbud Chapter of CNPS and SARSAS feel strongly that a review of full information on existing conditions, together with an analysis of the potential impacts of the proposed development and an examination of the alternative possible mitigations, will support an EIR/EIS determination that the ecosystem in the Sunset/Placer Ranch area is irreplaceable and that the impacts of this development cannot be mitigated.

This conclusion is consistent with the Placer County General Plan:

"The County shall require that significant development be planned and designed to avoid areas rich in wildlife or of a fragile ecological nature (e.g., areas of rare or endangered plant species, riparian areas)." (Policy 1.1.2)

The Sunset/Placer Ranch Area is indisputably an area "rich in wildlife" and of a "fragile ecological nature" that is home to several endangered or rare native plant and animal species. It is not "vacant" land; it is an important part of the heritage of Placer County -- and the State of California that is thousands of years old. The vernal pool complexes of Sunset/Placer Ranch have, until now, survived the pressures of growth and development when 90% of such ecosystems have vanished.

Policy 1.1.2 continues "Alternatively, where avoidance is infeasible or where equal or greater ecological benefits can be obtained through off-site mitigation, the County shall allow project proponents to contribute to off-site mitigation efforts in lieu of on-site mitigation."

It is incumbent upon the County to demonstrate that avoidance is infeasible; there is no urgent public need that warrants the unmitigatable environmental impacts that will result from this development. There has been no demonstration of a pressing demand for over 5,000 high-income, low-density housing units, nor for 9 million square feet of new commercial real estate, especially in this area that lacks infrastructure and transportation to support a large influx of population and business. Instead, this project is speculative, an attempt to stimulate economic growth in an area where, historically, there has been little or no demand for development.

It is also incumbent upon the County to demonstrate that mitigations will result in no adverse impact upon the environment, and that the cumulative effects of the takings and mitigations across the whole of Placer County have not resulted in further loss of vernal pool habitat, and/or further endangerment of rare plants and wildlife. There is a growing body of evidence demonstrating that vernal pools and their plant and animal communities cannot be mitigated offsite; they have not been recreated/relocated with any long-term success. This is because of the intricate inter-relationships among the whole rich complex of life in vernal pool ecosystems (for example, native plants and native bees with unique interdependence; one cannot survive without the other). This is also a result of the delicate balance of geology, hydrology, topography, and other physical characteristics that are difficult or impossible to duplicate in man-made vernal pools.

To the extent that it might be possible to mitigate offsite, it is necessary to use state-of-the-art science, which takes 10 years of sustained effort and great expense to survey, research, build, monitor, and evaluate. This also involves a careful and consistent program of comparing and conducting tests of the newly created vernal pool against a "control", an unaltered naturally occurring vernal pool, to measure the success or failure of the new ecosystem on a regular basis over time.

We look forward to working with Placer County throughout the environmental review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeanne Wilson", with a long horizontal line extending to the right.

Jeanne Wilson, President  
CNPS Redbud Chapter

Jack Sanchez, President and Founder  
Save Auburn Ravine Salmon and Steelhead

TO: Shirlee Herrington, Environmental Coordination Services

FROM: Charlene Daniels

SUBJECT: NOP for the Proposed Sunset Area Plan/Placer Ranch Specific Plan Project

DATE: December 5, 2016

Thank you for the opportunity to comment on the Notice of Preparation for a Draft Environmental Impact Report for the Proposed Sunset Area Plan/Placer Ranch Specific Plan Project. I have the following comments.

- 1) Per table 1-5 of the Placer County General Plan, there is a one-mile buffer from the Western Regional Sanitary Landfill. The EIR needs to discuss in detail how the specific plan will comply with this buffer.
- 2) The EIR needs to discuss water availability for the specific plan. After a five-year drought, this is an important issue. The discussion should also include compliance with General Plan policy 6.A.13 that addresses protecting groundwater resources from contamination and overdraft.
- 3) The High Density Residential (HDR) district is described in the Placer Ranch Specific Plan as having a density range of 12 to 30 units per acre. Since the maximum residential density identified in the Placer County General Plan is 21 units per acre, the project description and the EIR should make it clear what the County's maximum residential density is. Any density bonuses that are granted for the project should be based on the maximum density. It is a little confusing combining the density bonus units with the permitted density range of the HDR district. The density bonus units should be handled separately.
- 4) The NOP notes that 720 acres of farmland will be lost as a result of the specific plan development. This appears to be a significant impact and mitigation measures to reduce this impact must be addressed.

Ref: NOP PRSP



2150 River Plaza Drive #450  
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Timothy D. Taron  
916.567.7329  
ttaron@hsmiaw.com

December 5, 2016

Via Email ([cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov))  
and U.S. Mail

Shirlee I. Herrington  
Environmental Coordination Services  
Placer County Community Development Resource Agency  
3091 County Center Drive, Suite #190  
Auburn, CA 95603

**RE: Notice of Preparation--Sunset Area Plan/Placer Ranch Specific Plan Project (the "Project"), Notice of Preparation of a Draft EIR**

Dear Ms. Herrington:

This firm represents Stanford Ranch 1, the owner of APN 017-250-006-510 located in the City of Roseville, immediately adjacent to the southern boundary of the Project (the "Property"). We note that the proposed alignment of Foothills Blvd. as shown in the proposed Project would necessarily cause the extension of Foothills into the City of Roseville to bisect the Property in a manner that would render the entire Property useless for development. As such, the County and/or the City will be required to purchase the entire Property in order to effect the Project as designed.

The subject DEIR should take this impact into account and analyze the impacts of this alignment. It should also examine alternatives that would avoid these impacts.

Very truly yours,

HEFNER, STARK & MAROIS, LLP

By 

Timothy D. Taron

TDT:sk

K:\Stanford Ranch I\Foothills Business Park (0807-0104)\ltr herrington (120516).docx

December 1, 2016

Ms. Shirlee Herrington, Environmental Coordination Services  
Placer County, Community Development Resources Agency  
3091 County Center Drive, Ste. 190  
Auburn, CA 95603

RE: Comments on NOP of a Draft EIR for the Proposed Sunset Area  
Plan/Placer Ranch Specific Plan Project

Dear Ms. Herrington:

Thank you for allowing the community to give comment to the above mentioned project. As you know, the County has severe shortage of affordable workforce housing and given the nature and size of this project, affordable housing should be prioritized.

The EIR needs to provide a detailed jobs/housing balance analysis that evaluates whether the plan provides sufficient housing to accommodate the salaries of the new workforce in the plan area. The EIR should acknowledge the project has the potential to create a significant impact on affordable/workforce housing and appropriate mitigation measures should be proposed to reduce this impact to a level that is less than significant.

The Entertainment Mixed-Use (EMU) designation states that "the provision for workforce housing associated with, and subordinate to the EMU district, is highly encouraged". The project description identifies this as an issue so it may be better to include mandatory provisions to ensure that additional workforce housing, beyond that required by the 10% housing element policy for specific plans. An incentive approach would not necessarily provide the needed housing.

The EIR needs to clarify the basis for the "pool of 150 density bonus units" and should describe the assumptions made to determine them.

Per policy 4.B.6 of the Placer County General Plan Public Facilities and Services Element, a fiscal impact analysis needs to be prepared.

The NOP for this project states the plan will comply with the County's requirement of providing 10 percent of residential units in specific plans be affordable (i.e., 4 percent very-low, 4 percent low, 2 percent moderate). Student housing needs to be treated as a separate issue as it is very likely that student housing would take most, if not all, the units provided by this policy. If this occurs, there may be very limited housing available for the new workforce. This appears to be in line with provisions in the EIR for the Regional University Specific Plan.

In-lieu fees should only be permitted if it can be demonstrated that the affordable units cannot be developed onsite.

The project's impact to affordable housing will be significant and housing element policy should be used as a mitigation measure to help reduce the severity of this impact. As required by Government Code 65454, a specific plan needs to be consistent with the county's general plan. Projects that are inconsistent with the general plan create a significant impact.

We appreciate the opportunity to comment.

Sincerely,



Veronica Blake, CEO  
Placer Community Foundation  
PO Box 9207  
Auburn, CA 95604

VB/fd



PLACER COUNTY WATER AGENCY  
SINCE 1957

BOARD OF DIRECTORS      BUSINESS CENTER  
Gray Allen, District 1      144 Ferguson Road  
Primo Santini, District 2      MAIL  
Mike Lee, District 3      P.O. Box 6570  
Robert Dugan, District 4      Auburn, CA 95604  
Joshua Alpine, District 5      PHONE  
Einar Maisch, General Manager      (530) 823-4850  
WWW.PCWA.NET      (800) 464-0030

Sent via email: [cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov)

December 16, 2016

Shirlee Herrington  
Environmental Coordination Services  
County of Placer  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

SUBJECT:      Sunset Area Plan / Placer Ranch Specific Plan Project  
                 Notice of Preparation of a Draft Environmental Impact Report

Dear Ms. Herrington:

The Placer County Water Agency (PCWA) has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Sunset Area Plan / Placer Ranch Specific Plan Project dated November 3, 2016.

The Agency provides the following comments on the NOP for the proposed Project:

- Page 8 of the NOP, Sunset Area Plan Utilities Section, discusses the need for water pipelines to be extended to the site from PCWA's existing infrastructure (pumping facilities, storage tank, transmission mains) from an off-site location. There is a need for future water utility infrastructure within the rights-of-way of Placer Parkway, from the Whitney Ranch Parkway crossing of SR 65 to future developments to the west. The proposed infrastructure is anticipated to be a 42-inch treated water pipeline necessary to serve the buildout demands of the Sunset Area Plan, including Placer Ranch, and future developments such as Regional University and Placer Vineyards. Currently, PCWA only has a single pipeline in Sunset Boulevard connecting the Sunset Area to the water distribution system. This single connection is not adequate for the buildout demands of the Sunset Area Plan. The Placer Ranch Specific Plan will be required to perform hydraulic modeling of their proposed water system and its impacts to PCWA's existing system.
- Page 8 of the NOP, Sunset Area Plan – "be designed as a looped system following major arterial and collector street alignments for a transmission main grid consisting of 12-inch to 24-inch diameter mains." The proposed project area may ultimately receive water from the Sacramento River. Consequently, the transmission pipeline system through the project area will need to be designed and constructed to convey water from the west to the east as well as from the

east to the west. In order to provide future treated water service from a future diversion off the Sacramento River to the proposed Placer Ranch development, certain water distribution pipelines may need to be oversized.

- The proposed on-site water distribution system for the proposed projects should include on-site potable and recycled water infrastructure that may consist of water storage tank(s), sized in accordance with PCWA's master planning criteria, and associated pumping/pressure reducing stations, that may be required. A hydraulic model will need to consider the storage needs of the proposed Placer Ranch Specific Plan. The project EIR should evaluate the potential impacts of the water storage facilities. Water storage and distribution facilities that require constant monitoring and control such as storage tanks, pump stations, and pressure reducing stations, will include supervisory control and data acquisition (SCADA) equipment allowing critical operational data to be communicated to PCWA's central control system. This equipment typically includes a radio antenna and mast at each site that has clear line of sight to PCWA's existing SCADA communication system. The specific design details associated with this equipment will be determined during design of each applicable piece of water infrastructure.
- A Water Supply Assessment will be needed pursuant to Senate Bills 221 and 610 for the Placer Ranch Specific Plan. Please contact PCWA at the appropriate time to coordinate verification of the availability of water supply to serve the project. Ultimately PCWA anticipates the project to be served from either a potential diversion off the Sacramento River or the proposed Ophir Water Treatment Plant. PCWA requests that the EIR examine existing and future water supplies and the infrastructure to convey water through the plan area. This should include the Yuba/Bear River supply, the American River supply and the Sacramento River supply.
- The project may in the future be served from the Sacramento River. This CVP water is subject to cut backs of up to 25% during droughts. The project should provide a sufficient number of groundwater wells to provide a minimum of 25% of the maximum day water demand for drought and emergency purposes. The project proponents shall conduct and provide water quality sampling and testing to determine if the groundwater is suitable in the proposed locations, or in need of treatment. The Agency has a policy of chlorinating all groundwater sources.
- Until such time that the PCCP is implemented, PCWA will require the proof that projects to be served from PCWA's future Ophir Water Treatment Plant and/or the potential diversion from the Sacramento River have consulted with the US Fish and Wildlife Service. PCWA consulted with the US Army Corps of Engineers to obtain a Nationwide Permit to construct the Ophir Water Treatment Plant, which would serve treated water to future new development discussed in the NOP. Through that process, the Corps consulted with the US Fish and Wildlife Service. US Fish and Wildlife Service requested PCWA to provide an analysis of cumulative effects of the Ophir Water Treatment Plant project that considered

the effects of increased water treatment capacity on the potential to develop areas that will not be required to obtain permits from the Corps. As part of this consultation with US Fish and Wildlife Service, PCWA executed an agreement with the Service that it will not provide treated water service to new development without proof from the applicant that consultation has been completed with the US Fish and Wildlife Service and that the project has satisfactorily complied with its requirements under the Endangered Species Act. Until such time that the PCCP is implemented, the proposed diversion from the Sacramento River permit will have these same requirements.

- The use of recycled water for irrigation purposes is an important component of PCWA's Urban Water Management Plan. The Agency fully supports and encourages the use of recycled water for irrigation purposes for this project. Recycled water infrastructure would include an appropriately sized water storage tank, pump station, and distribution pipelines, as needed. The project will need to be in compliance with all State regulations regarding the use of recycled water, such as backflow prevention.
- Page 9, Infrastructure – Most of these listed infrastructure improvements are not applicable now that Placer Ranch is a County project. Please refer to the draft Placer Ranch Water Master Plan by MacKay & Somps for updated water infrastructure and infrastructure connections.
- A small PCWA satellite corporation yard is necessary for storage of materials and equipment. This is essential to efficiently maintain a water system within west Placer County. The site should be co-located at a planned water storage/pump station for either potable water or recycled water.

PCWA appreciates the opportunity to review and respond to this NOP. As Placer County considers updates to its Sunset Area Plan, it is essential that PCWA and Placer County staff continue to coordinate and plan for water infrastructure that not only supports the Sunset Area Plan, including Placer Ranch, but other Placer County projects such as Regional University and Placer Vineyards. PCWA looks forward to actively working together with Placer County staff to serve areas of growth within western Placer County.

Sincerely,



Brian Rickards, PE  
Associate Civil Engineer

BR:jh



**RIO BRAVO ROCKLIN**  
3100 Thunder Valley Court  
Lincoln, CA 95648  
(916) 645-3383

December 15, 2016

Environmental Coordination Services  
Placer County, Community Development Resources Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

**Re: Public Comment for the Notice of Preparation for Sunset Area Plan / Placer Ranch Specific Plan Project (PLN16-00341, State Clearinghouse# 2016112012)**

To Whom It May Concern,

Thank you for the opportunity to review and comment on the subject project. Rio Bravo Rocklin, a 24 MW biomass-fired power generation facility located at 3100 Thunder Valley Court, Lincoln, California, is submitting this letter in response to the Public Scoping Meeting conducted November 29, 2016 and the Notice of Preparation of a Draft Environmental Impact Report for the Sunset Area Plan / Placer Ranch Specific Plan (NOP). Rio Bravo Rocklin has functioned as a biomass power plant in the Sunset Industrial Area since April, 1989. The facility benefits the region by providing an alternative to open burning of forest and agricultural biomass, diversion of landfill materials, and employment for hundreds of facility staff and contractors. In addition, the facility generates green, renewable, carbon neutral electricity for the community.

Based on information provided at the November 29, 2016 public scoping meeting and the NOP, Rio Bravo Rocklin would like to request that the EIR include; discussions regarding the definition of "Entertainment / Mixed Use" area, consideration of a Community Choice Aggregation (CCA) for electricity in the area, and detailed discussion regarding the timeline for the implementation of the project. These are discussed further in the following sections.

#### **ENTERTAINMENT / MIXED USE DEFINITION**

Rio Bravo Rocklin is currently zoned Industrial (IN-Dc). The proposed Sunset Area Plan Land Use Diagram (Exhibit 3 of the NOP) locates Rio Bravo Rocklin within an area designated Entertainment-Mixed Use (EMU). The NOP defines EMU as:

*"provides for entertainment-oriented uses intended to draw visitors and customers from beyond South Placer County. This includes theme parks or super-regional destination retail, as well as associated shopping, restaurants, recreational facilities, and lodging. This category also allows for medical services, including hospitals and extended care establishments, as well as medical clinics, offices, and laboratories. Provision for workforce housing associated with, and subordinate to the Entertainment Mixed Use District is highly encouraged."*

Rio Bravo Rocklin suggests an expanded definition of the EMU with examples and consideration of currently existing facilities within the area and potential land use incompatibilities be included in the environmental impact report (EIR).

**COMMUNITY CHOICE AGGREGATION**

A CCA allows a district to be formed within an existing electric service area to combine the purchasing power of customers within that area to contract with renewable energy providers for electric service. As a renewable energy generator, Rio Bravo Rocklin has the potential to provide energy for a CCA to serve the Sunset Industrial Area. The facilities 24.4MW capacity has the potential to serve approximately 20,000 homes and businesses.

Rio Bravo Rocklin recommends an expansion of the Utilities and Energy section in the Sunset Area Plan / Placer Ranch Specific Plan EIR to include a discussion on CCA and its benefits, including electricity generated from Rio Bravo Rocklin.

**PROJECT TIMELINE**

Rio Bravo Rocklin suggests a discussion of an estimated timeline of implementation of the Placer Ranch Project be included in the EIR. Components of the project that hold potential financial impact to Rio Bravo Rocklin need to be budgeted in advance. Items to be considered in a project timeline include Placer Parkway, entertainment/mixed use area development, and construction of Placer Ranch section PR-83 campus park.

Rio Bravo Rocklin appreciates this opportunity to comment on the NOP and looks forward to continuing to serve the Sunset Industrial Area and Placer County.

Please contact me at (916) 645-3383 if you have any questions.

Sincerely,



Travis Finn  
Rio Bravo Rocklin



December 14, 2016

RECLAMATION  
DISTRICT 1000

Shirlee Herrington  
Environmental Coordination Services  
Community Development Resource Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

Re: Notice of Preparation of Draft Environmental Impact Report for the Proposed Sunset Area Plan/Placer Ranch Specific Plan Project

Dear Ms. Herrington:

Reclamation District No. 1000 ("RD 1000") is the entity responsible for providing drainage and flood protection to the Natomas Basin in the Counties of Sutter and Sacramento. Additionally, RD 1000 maintains levees in the Pleasant Grove area along Pleasant Grove Creek for the protection of properties therein. We appreciate the opportunity to provide comments on the Notice of Preparation (NOP) for the Draft Environmental Impact Report (EIR) for the Proposed Sunset Area Plan/Placer Ranch Specific Plan Project. As part of the Draft EIR, we request the storm water drainage impact of the proposed project on the Natomas Cross Canal watershed including the Pleasant Grove Creek levees and RD 1000's east levee be fully analyzed and appropriate mitigation measures be included in the project to fully address these impacts.

We are concerned that the impact of increased storm water drainage flows into the Natomas Cross Canal watershed could significantly impact our existing perimeter levee and interior drainage system if these impacts are not appropriately mitigated. We are currently working with the Army Corps of Engineers (COE), California Central Valley Flood Protection Board (CVFPB) and Sacramento Area Flood Control Agency (SAFCA) on improvements to the perimeter levee system to address our regional flood risk. In addition, we are working with SAFCA and Sutter County on regional projects within the Natomas Basin to address flows that come through the Sankey Road gap into our system during large flood events. We are concerned that impacts from your proposed projects could impact one or both of these efforts.

We have been coordinating with the City of Roseville and other interests in Placer County on similar issues and would be glad to include Placer County in these efforts. Again, thank you for the opportunity to provide comments on the NOP for the Draft EIR on the proposed project. If you have any questions please contact me at 916-922-1449 or via email at [pdevereux@rd1000.org](mailto:pdevereux@rd1000.org).

Sincerely,

Paul Devereux  
General Manager/District Engineer

cc: Danelle Stylos, Sutter County  
Carl Walker, City of Roseville  
Timothy Washburn, SAFCA  
Joe Henderson, RD 1001  
George H. Booth, County of Sacramento  
Andrew Darrow, County of Placer

12/15/16

Notice of Preparation for Sunset Area Plan / Placer Ranch Specific Plan

To whom it may concern or cares;

I attended the 6:00-8:00 p.m. NOP Scoping Meeting on November 29, 2016. I've been to a lot of meetings but apparently never a scoping meeting. I did not realize there would be no answers given, only questions taken. I did not want to waste everyone's time with my concerns so at the conclusion of the meeting I was looking for a copy of the paperwork the eight or so attendees picked up on their way in. There were none left. I guess the eight or so attendees at the earlier meeting grabbed up all the extra copies. I ended up with about 7 or so of the staff around me wondering what my concerns were and willing to answer my questions because of the extra time they had available. I appreciated that, so I proceeded to ask my questions. It didn't take long before there was only one staff member left and the others had slowly drifted away. Guess they didn't want to answer my questions after all. So here are some of my questions/concerns:

1. How do I get the same benefit of the County fronting all the money, staff and time it takes to take a piece of property through the development process? In other words, if our property ever develops, how do I get that benefit paid for by the people of Placer County with no money out of my pocket?
2. If in the past two other private developers lined up to take on this project, then decided for whatever reason it would not work for them, doesn't this raise a red flag that the project is not a good project? I.e. Too much up front money to complete, no guarantees of potable water, too many environmental issues to mitigate, too much of the project would need to be dedicated (given away)making it unprofitable, etc etc.
3. How long will it be before you close the dump? In my opinion, by moving forward with this project the days are numbered for the dump, especially with the college dorms directly across the road from it. I live several miles away and in the summer it is not uncommon to smell it. The cupcakes living across the street from it will need a hepa filter in their safe room.
4. When did Placer County get into the "for profit" business? I asked why the County was running this project; the response was that the County felt the college was going to be a big money maker and economic draw.
5. How is a private developer supposed to compete with the County? PCWA is already installing potable water lines to supply the project, the PCCP is going to gain a large amount of land set aside for them, the Placer Parkway is on the wish list for a number of agencies, the dump is somewhat under County control, the private property owners are getting the benefit of the project at no cost to them, if a private developer fights against this project with any of these agencies or the county itself they will be on a short list, sounds to me like all the main wheels have been greased to avoid any major opposition. How is a private developer supposed to compete with the County?

6. Why is there no shortage of water for your project, but there is for others? I am in Zone 5 of the PCWA. Every year there is some kind of drama for us to get our raw water for the summer, but as stated above, PCWA is installing potable water lines to service your project before it's off the ground.

7. How can you move forward with a project with important items not in service? The potable water is to come from a plant that has not broken ground for construction yet. The PCCP is not approved. We don't have a regular shuttle to Mars.

8. How does this project or any development help agriculture? Seems like a lot of agriculture land will be lost with this project. Preserving some land with PCCP does not make up for the land lost for agriculture forever. I have the utmost respect for the Placer County Agriculture Department, but they are constantly losing productive land to development.

9. How is PCWA drilling wells for this project going to help sustain the ground water table? I was told at the scoping meeting PCWA will drill 2 wells just for this project, but only for emergency purposes, drought etc. I don't think that will help my wells in a drought.

I misplaced the business card from the lady at the Scoping Meeting that was the only one that stayed around to answer my questions. She was the one greeting all 8 of us (+or-) that attended the meeting. I would like to thank her for her time.

Sincerely,

Albert Scheiber

P.O Box 250

Lincoln, CA 95648



---

City of Lincoln • City of Rocklin • City of Roseville • Placer County

December 14, 2016

Shirlee Herrington  
Environmental Coordination Services  
Community Development Resource Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

RE: NOP for Sunset Area Plan/Placer Ranch Specific Plan Draft EIR

Dear Ms. Herrington,

Thank you for the Notice of Preparation (NOP) for the Draft Environmental Impact Report (EIR) for the Proposed Sunset Area Plan(SAP)/Placer Ranch Specific Plan (PRSP) Project. The NOP mentions that the planned Placer Parkway would bisect the SAP from west to east, connecting to SR 65 (Page 15) and the future Placer Parkway is identified on both the SAP Land Use Diagram (Exhibit 3) and the PRSP Land Use Diagram (Exhibit 4).

The proposed Placer Parkway is a high priority regional transportation project. It is a part of the Sacramento Area Council of Governments (SACOG) Metropolitan Transportation Plan/Sustainable Communities Strategy 2036 (MTP/SCS 2036) and its Metropolitan Transportation Improvement Program (MTIP 2015/18). The Placer Parkway will connect SR 65 at Whitney Ranch Parkway to State Route (SR 99) at Sankey Road. The Federal Highway Administration (FHWA), Caltrans, and the South Placer Regional Transportation Authority (SPRTA) completed a Tier 1 environmental review (FHWA-CA-FEIS-2009-46 and SCH No. 2003092069) to select and preserve a 500-foot to 1,000-foot wide corridor for Placer Parkway. The identification of a precise roadway alignment within the selected corridor for a four-lane (ultimate six-lane) freeway with up to five interchanges will be the subject of a later Tier 2 EIR, which Placer County is currently taking the lead on the first segment between State Route 65 and Foothills Boulevard.

On December 3, 2009, the SPRTA Board certified the Final Program EIR and adopted Findings, a Statement of Overriding Considerations, and a Mitigation Monitoring & Reporting Program for CEQA compliance (SPRTA Board Resolution #09-06). The Board also selected the Placer Parkway corridor – Alternative #5 with a No-Access Buffer (SPRTA Board Resolution #09-07). On May 7, 2010, FHWA issued a Record of Decision selecting Placer Parkway Corridor Alternative 5 with a non access buffer zone pursuant to the National Environmental Policy Act (NEPA).

On February 22, 2012, the SPRTA Board adopted the following Placer Parkway Corridor Policy:

1. The Placer Parkway Corridor Tier 1 environmental document provides for:
  - a. Limited access between Pleasant Grove Road and Fiddymont Road and
  - b. Potential adjustments to the corridor width as part of the Tier 2 environmental document.
2. Support jurisdiction efforts on project level development proposals in the Parkway vicinity so long as they:
  - a. Do not jeopardize Tier 1 approvals and regulatory agency agreements
  - b. Do not result in increased net costs to the overall Parkway project

The proposed SAP/PRSP is located in the section of Placer Parkway with a 500 foot wide corridor east of Fiddymont Road and a 1,000 foot wide corridor west of Fiddymont Road. Attached is the adopted Placer Parkway Alternative 5 corridor. The SAP/PRSP should reflect the latest corridor alignment so that identification of the future roadway is not precluded during the Tier 2 environmental process.

SPRTA appreciates the County of Placer's cooperation and participation in the Placer Parkway planning and environmental process. If you have any questions, please contact me at (530) 823-4030.

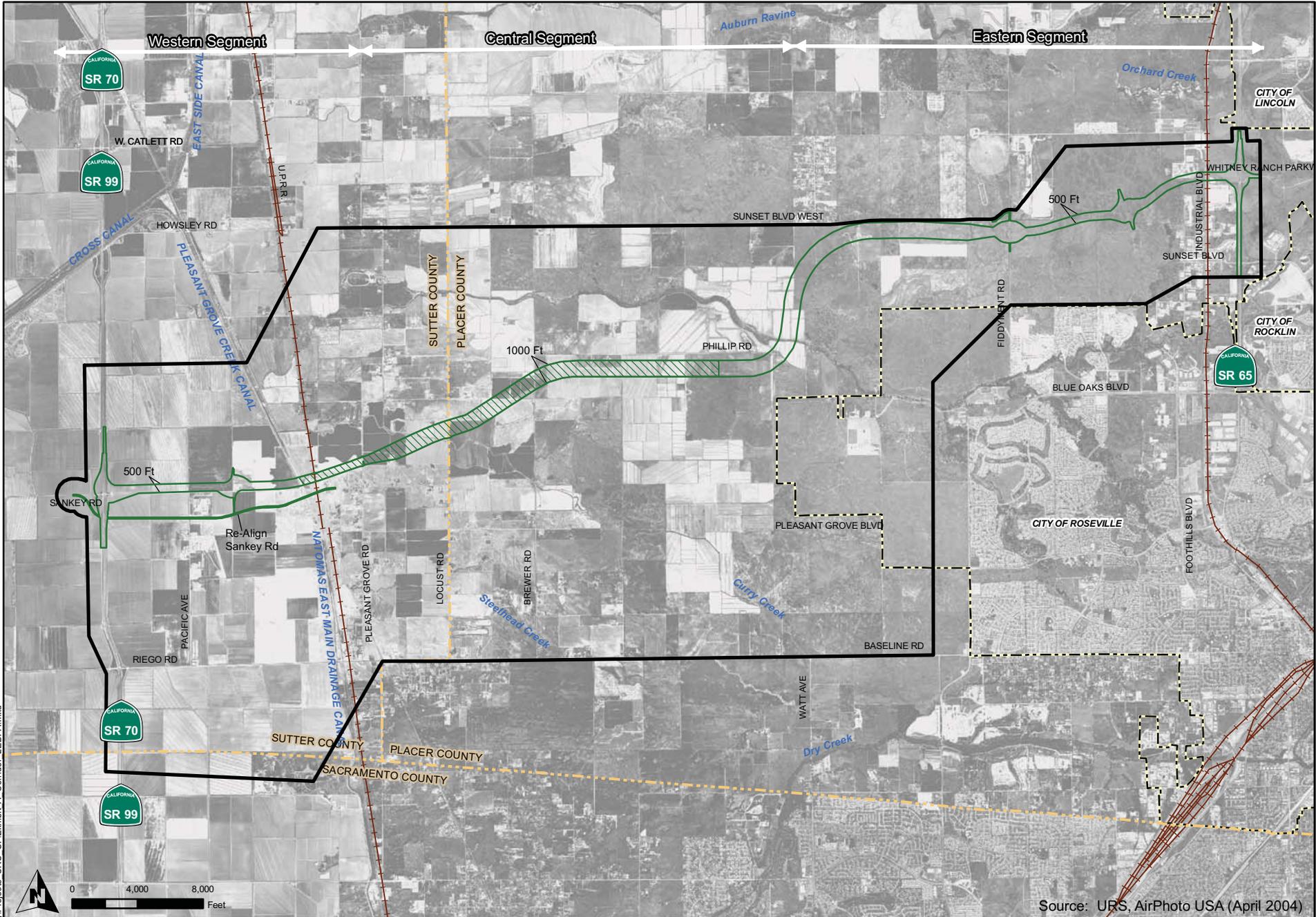
Sincerely,



Celia McAdam, AICP  
Executive Director

Enclosure – Selected Placer Parkway Corridor (Alternative 5) with No-Access Buffer

Copies: Gregg McKenzie, Placer County Community Development  
Rich Moorehead, Placer County Public Works



Source: URS, AirPhoto USA (April 2004)

L:\GIS\Placer\_Parkway\Projects\_URS\_SF\Exhibit A\_Corridor\_LEDPA.mxd

- Study Area Boundary
- City Boundary
- County Boundary
- Multiple Easements



## Placer Parkway Corridor Preservation Tier 1 EIS/EIR

## Selected Placer Parkway Corridor with No-Access Buffer

*Exhibit A*  
**Resolution No. 09-07**  
**December 3, 2009**



# SUTTER COUNTY

## DEVELOPMENT SERVICES DEPARTMENT

Building Inspection  
Code Enforcement

Planning  
Environmental Health

Fire Services  
Engineering

Road Maintenance  
Water Resources

December 15, 2016

Environmental Coordination Services  
Community Development Resource Agency  
Attn.: Ms. Shirlee Herrington  
3091 County Center Drive, Suite 190  
Auburn, CA 95747

SUBJECT: Comments Regarding Notice of Preparation of a Draft Environmental Impact Report for the Proposed Sunset Area Plan/Placer Ranch Specific Plan Project.

Sutter County thanks you for the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the Proposed Sunset Area Plan/Placer Ranch Specific Plan Project

The CEQA analysis should include the cumulative impacts of stormwater runoff resulting from developed lands flowing into our jurisdiction. As the project is developed it is requested that stormwater retention/detention areas be incorporated into the project design, and built as needed, so that post development stormwater flows and volume do not exceed predevelopment levels.

In summary, the topics discussed above remain of paramount concern to the County of Sutter and request that these issues be addressed in the DEIR for this project. Please provide our office with all future notices regarding this project.

Respectfully,

DANELLE STYLOS  
DEVELOPMENT SERVICES DIRECTOR

PAEN NEW DEVELOPMisc EIR IS Reviews\NOP Sunset Area Plan\_Placer Ranch Specific Plan\12-15-16 NOP Comments PRSP.docx

December 16, 2016

Placer County  
Community Development Resources Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

Attn: Shirlee Herrington, Environmental Coordination Services

Re: Sunset Industrial Area/Placer Ranch Specific Plan

Dear Ms. Herrington,

I appreciate the opportunity to comment on the Sunset Industrial Area Plan Update and the Placer Ranch Specific Plan (SIA/PR) and contribute in a meaningful way to the development of an outstanding, innovative and remarkable living and working environment in west Placer County.

Environmental Analysis:

This EIR is really two documents: a plan (at a program level, which means another CEQA review will occur before a project is built) and a project to develop a portion of this plan area (which is a project-level review, so no future CEQA). Also, the specific plan is adding more detail to the County's General Plan. Why is this document not a joint EIR/EIS, which would seem a more appropriate vehicle for a thorough analysis of the SIA/PR because Federal, State and local regulatory statutes pertain to management of natural resources in the Plan area?

Through the EIR process, the County has a responsibility and duty to review all State Legislature enacted and pertaining to greenhouse gas emissions and determine whether the SIA/PR Plan conforms to policy guidelines set forth in the legislation including but not limited to:

1. The Cortese Knox Hertzberg (CKH) Act begins with the following statement. "The Legislature finds and declares that it is the policy of the state to encourage orderly growth and development which are essential to the social, fiscal, and economic well-being of the state. The Legislature recognizes that the logical formation and determination of local agency boundaries is an important factor in promoting orderly development and in balancing that development with sometimes competing state interests of discouraging urban sprawl, preserving open-space and prime agricultural lands, and efficiently extending government services." (§56001)

2. Governor Brown's Executive Order B-30-15 that calls for a reduction in greenhouse gas emissions of 40% below 1990 levels by 2030. This goal has also been incorporated into SB 32 (Pavley) now under consideration by the state legislature.

3. California Air Resources Board, First Update to the Climate Change Scoping Plan, May 2014. Safeguarding California: Implementation Action Plans, Agricultural Sector Plan, California Natural Resources Agency, March 2016, at 24. This report also includes a vivid and comprehensive description of the risks that climate change poses to California agriculture.

4. The Sacramento Area Council of Governments' (SACOG) Blueprint for sustainable growth provides goals and resources to Counties to create a jobs/housing balance in the region.

5. Senator Steinberg's SB 375 which sets regional targets for reducing greenhouse gas emissions aligning regional plans of housing needs and regional transportation planning to reduce greenhouse gas and provides CEQA incentives for development projects that are consistent with a regional plan that meets greenhouse gas reduction goals. The law also strengthens several existing requirements for public involvement.

6. Assemblyman Nunez's AB 32 The Global Warming Act of 2006 establishes a statewide greenhouse gas emissions limit such that by 2020 California reduces its greenhouse gas emissions to the level they were in 1990.

7. The American Farmland Trust's White Paper, which expands on the California Farmland Mapping Project and a report from Calthorpe Analytics and Energy Innovations studies that determined that CA's Greenhouse Gas (GHG) reduction goals will not be attained without smart-growth policies that protect farmland.

Is Placer County committed to supporting the aforementioned State Policy for GHG reduction? How does the SIA/PR project demonstrate that commitment? Please elaborate on how Placer County demonstrates this commitment for each of the aforementioned policies and legislation.

Project Alternatives:

In its analysis of Project Alternatives, please analyze why Placer County/Roseville needs a single additional unit of low density, high end housing that has brought sprawl and decreased quality of life across the region and fails to meet the housing needs of 43% of our population. A Project Alternative that requires detailed study is one that may be characterized as "smart growth". A smart growth community can provide many more housing units than the low-density project envisioned in the SIA/PR; but can do so with a compact and environmentally light footprint. This Alternative will envision a place that is truly a desirable and affordable for populations that are chronically underserved in Placer County – young families, singles, students, artists and entrepreneurs. A smart growth Alternative for the SIA/PR will have a synergistic effect of conserving farmland and mitigating climate change; while providing critically needed affordable housing. This Alternative is green, family and transit friendly throughout, with a range of housing - from single room occupancy, to lofts, to affordable single-family homes with street scale features and an art and cultural focus. This Alternative is not designed for the automobile – three and four car garages do not define the streetscape. It is designed for pedestrian livability, community interaction and smart energy use. With the County as project designer – a community that shatters Placer County stereotypes and puts Placer County on the regional, national and international map for innovation and livability and smart energy use is possible.

The EIR must evaluate the likely demographics in the proposed Plan and the median income necessary to own a home in the Plan area. What is the likely demographic of a smart growth community which presents a significantly different housing mix and cost point? Please compare the likely spending habits of the smart growth community Alternative to that for a demographic that will occupy housing in the proposed SIA/PR. Which demographic will more likely support bond issues for schools, spend at local retailers, work and play in their community, and bring children to our community?

A recent analysis of statewide land use patterns and future options by Calthorpe Analytics and Energy Innovations found that “implementation of smart land use policy, in combination with technological advances in the energy sector, will be critical for the state to achieve its ambitious 2030 de-carbonization target. The [more efficient] land use patterns studied here could lead to even larger carbon emissions reductions than estimated because they will also preserve more land in California for carbon sequestering. Please analyze and compare the Greenhouse Gas (GHG) that will be emitted by the proposed project and compare it to GHG emissions from a smart growth community.

In evaluating Project Alternative, CEQA requires analysis of the No Project Alternative. For this Alternative, it will be critical that the analysis include an economic valuation of the natural environment and quantify the ecosystem-service value of every living and non-living thing in the project area. This analysis must look at present and future values of the natural ecosystem.

Climate Change and Farmland:

There is a growing body of research that establishes the economic and social value of plants for carbon sequestration and to offset global warming. As a part of the environmental analysis, we ask that you establish that the project meets the criteria established with by the California Supreme Court in the 2015 Newhall Ranch ruling, consistent with AB 32, The Global Warming and Agricultural Land Preservation Act (2013). See Center for Biological Diversity, et al. v. California Department of Fish and Wildlife, and The Newhall Land and Farming Company, 62 Cal.4th 204 (2015)

The American Farmland Trust (AFT) has determined that communities that protect farmland buffer against climate risks. Approximately 8,000 acres of farmland will be lost with build out of the SIA/PR. The farmland in the project area is classified as “important” in the Ca Farmland Mapping Project. What range of crops does “important” farmland support?

A White Paper by AFT, April 2016, called the Agricultural Land Conservation: An Important Part of California’s Climate Strategy sets demonstrates that providing long-term protection for farmlands is an important, if not essential, to achieving California’s greenhouse gas reduction goals. Does Placer County support California’s Climate Strategy and how is Placer County working to achieve the greenhouse gas reduction goals described in the AFT Strategy?

California Air Resources Board, First Update to the Climate Change Scoping Plan, May 2014. Safeguarding California: Implementation Action Plans, Agricultural Sector Plan, California Natural Resources Agency, March 2016, at 24 includes a vivid and comprehensive description of the risks that climate change poses to California agriculture. How will GHG from the SIA/PR contribute to the risks described in the California Air Resources Board Scoping Plan?

The groundbreaking research done by Professor Louise Jackson and her colleagues at U.C. Davis (2012) was the first to establish a connection between urbanization of farmland and the increase in greenhouse gas emissions. Their work found that in Yolo County GHG emissions from urban uses were roughly 70 times greater on a per acre basis than those from agricultural operations. A later study (2015) done for American Farmland Trust reached a similar conclusion after looking at emissions from the state’s leading crops and cities throughout California.

A study published by the Duke Nicholas School for Environmental Policy Solutions (2014) compared the greenhouse reduction potential of various agricultural practices documented in the scientific literature,

concluding that: "Because average greenhouse gas emissions from urban land uses are orders of magnitude higher than those from California croplands (approximately 70 times higher per unit area), farmland preservation, more than any of the other management activities, will likely have the single greatest impact in stabilizing and reducing future emissions across multiple land use categories." How many tons of CO<sub>2</sub> will be generated from the SIA/PR with a magnitude 70 (70 times greater) CO<sub>2</sub> emission compared to existing uses? What is the impact of projected new GHG emissions to climate change and achievement of the State's 2030 emission reduction goals?

Since the mid-1980's, an average of nearly 42,000 acres of the state's agricultural land has been converted to urban uses annually. Since the mid 1980's, a cumulative total of more than one million acres of farmland was lost to urban uses which generate 70 times as much GHG. Is it good leadership to design a community that takes 8000 acres of farmland with food production potential and convert it to an urban community generating 70 times the GHG? It is incumbent upon the County to carefully evaluate the environmental and loss of food production "costs" of the SIA/PR against the (perceived) "benefits" of economic growth within the SIA/PR. There must be a community discussion about whether this is good policy and good for the future of humanity.

If this trend continues, California will lose another 1.4 million acres of agricultural land by 2050. How many acres of Placer County farmland have been converted to urban uses since the mid 1980's? Does Placer County have a farmland conservation policy and is the proposed conversion of farmland to urban uses in SIA/Placer Ranch consistent with this policy?

Farmland conservation is a critical component of ensuring food security for the future. The Ca. Farmland Mapping Project describes the SIA/PR project area as important farmland. What crops may be successfully grown on "important farmland"? According to AST, California Farmland is so unique, it will be imperative for California to have sufficient farmland in the right locations to allow for food production and flexibility as impacts of climate change become more severe. What does AFT mean when it describes "right location"? Is the SIA/PR in a "right location"?

The State has allocated money to the Sustainable Agricultural Lands Conservation program to support local governments as they implement farmland conservation policies. Please describe how the SIA/PR plan might utilize these monies to support Placer County farmland conservation.

Williamson Act, officially the California Land Conservation Act, provides relief of property tax to owners of farmland and open-space in exchange for a ten-year agreement that the land will not be developed or otherwise converted to another use. In the SIA/PR project, the County of Placer proposes to cancel a Williamson Act contract on 720 acres of farmland. What qualities did the subject 720-acre farm have that justified the County's acceptance of a Williamson Act contract on it? What are the State and local tax penalties of a quick exit on 720 acres of contract land? Will taxpayers bear the penalty cost of a quick exit? In cases of breach of contract by an owner, the local government may seek a court injunction to enforce the terms of the contract. What provisions are available to the public who seek to compel the County to comply with terms and conditions of a contract?

#### Population and Housing

The County's 12/08/2016 Sunset Industrial Area Plan Update states that the County intends to attract "primary wage jobs" to locate in the SIA. For every primary wage job, the EIR must establish:

- 1) How many secondary or lower wage jobs, which support the primary wage jobs, will be needed in SIA/PR.
- 2) Determine where the secondary or lower wage earners will live and if the housing will be provided in the SIA/PR.
- 3) What the annual cradle-to-grave cost (time value, automobile maintenance, gas, CO2 generation etc.) will accrue to the second tier and lower tier workers who will be unable to afford housing with the SIA/PR or even proximate to their work site?

The Sacramento Area Council of Governments' (SACOG) Blueprint for sustainable growth provides goals and resources to Counties to create a jobs/housing balance in the region. Will this project make a substantial contribution to the attainment of the Blueprint?

The State Department of Housing and Urban Development has determined that 43% of the population of Placer County population is moderate, low and very low income. You may know that moderate-income family in Placer County earns \$76,000 per year. The annual family income required to purchase a home in the Placer Ranch subdivision is estimated to \$260,000. Will the SIA/PR project provide ownership opportunities and meet the housing needs of our teachers, nurses and medical support staff, merchants, service employees, health workers who will work in SIA/PR?

Although 43% of Placer County's population consists of people of middle, low and very low income, Placer County's Affordable Housing Goals and Policies in the County's General Plan and the SIA/PR will allocate 10% of the 5,287 housing units to persons of moderate, low and very low income. Of 5,287 units to be constructed, 528 will be available to persons of middle, low and very low income. How many of the single family homes in the SIA/PR will be affordable to persons with an income of \$76,000 per year?

Placer County policy allows developers, for only \$4,000 per unit, to buy their way out of the responsibility to provide any moderate and low-income units at all. What is the economic basis for the \$4,000.00 buy-out?

Within the SIA/PR development, that policy means that for a cash payment of \$2,112,000 (528 units x \$4,000) the future SIA/Placer Ranch developer can "avoid" producing the affordable housing within the SIA/PR.

Were the County to accept the buy out funds and apply the \$2,112,000 in buy-out funds to acquire land and develop housing affordable to middle, low and very low income Placer County residents at an off-site location, how many units of single family and multifamily housing affordable to person/family earning \$76,000 per year could be constructed? Does the County have an administrative mechanism to produce these units? If this buy-out policy has been utilized in other Placer County development approvals, how many total units have been "bought-out" and where is the replacement housing these buy out funds promised to provide?

How many developments in Placer County over the past 10 years have actually produced the 10% units on site and in conformance with the County's Housing Policy? What agency of the County monitors these units to ensure that the price continue to be affordable over time?

Will the County accept a buy-out for affordable units within the SIA/PR? Because the County is acting as designer for SIA/PR; which creates an unprecedented opportunity for the County leaders to create a community that meets the housing needs of all of Placer County citizens. Please analyze a Project Alternative with a housing mix that represents the demographic the County where 43% of residents require housing affordable to middle, low and very low incomes.

#### Natural Environment

Although the NOP describes SIA/PR plan area as “vacant” land, it is “full” and uniquely rich and complex ecosystem. An ecosystem is a community of living organisms in conjunction with the nonliving components of their environment interacting in a system that is complete. To mitigate Federal and State-protected plant and animal habitat and species are found throughout the SIA/PR site will have impacts even within the mitigation sites that be mitigated. How then can any mitigations proposed demonstrate that there is no adverse impact to the environment?

The EIR should include full analysis of the existing conditions and the impacts of the proposed development and mitigations, including a biological and geological assessment that presents specific data regarding the unique vernal pools in the path of the proposed development.

The project has the potential to indirectly impact biological resources in three open space reserves – Orchard Creek Conservation Bank, Warm Springs Mitigation Bank and Moore Ranch Conservancy mitigation sites and the area being considered in the Placer County Conservation Plan (PCCP) by 1) impacting the watershed 2) noise and light pollution, 3) runoff from impervious surfaces (fuel, oils, hydraulic fluid and other hazardous substances) and landscaped areas (fertilizers, pet waste and litter). How will these concerns and in addition, pollution from anticipated flooding, runoff, soil erosion and sediment discharges be managed so that the open space reserves function and support biologic communities in perpetuity?

Nearly all the SIA/PR area is within the vernal pool recovery area established by the US Fish and Wildlife Services. Habitat for species listed under the Federal or CA Endangered Species Acts cannot be disturbed without a Federal or State permit. Identification of the over 200 species of plants that grow in and around vernal pools and the integral role these plants also play in the complex food-web of life of the vernal pool throughout the calendar year must be analyzed. Each vernal pool system can be completely unique and must be analyzed independently. These species need to be surveyed for by qualified and properly permitted biologists using protocol surveys during the correct seasons as required by the agencies and in consultation with them, and impacts need to be analyzed and mitigated. The Xerces society is seeking endangered species listing for four native bee specie which depend upon the vernal pool ecosystem. Will a survey for these bees be undertaken under consultation with the Xerces Society?

Vernal pools have three distinct phases. Will biological surveys be conducted in each phase? A “wet phase” usually during the winter, when the rains come and fill up the leak-proof, shallow depressions with life-giving water. And give life, it does. Healthy pools are brimming with aquatic, bird, and new plant life. The aquatic life is in a frenzy to hatch, feed, grow and mate to secure a future generation; the birds are feeding on the aquatic and plant life for their long migrations and future broods; and the plants are beginning to sprout. Next comes the “flowering phase” in the early spring. The flower displays are constantly changing, from week to week: ribbons and rings of yellow, white, pink, blue, and purple. The aquatic life is pretty much gone or beginning to fade away, as the water in the pools begins to

evaporate, but, not to worry, they have left a promise in the form of eggs and cysts bound into the muddy bottom of the pool, along with many of the plants' seeds until next year. Next, comes the "dry phase", in which the hot summer sun and desiccating wind does its work. The vernal pool becomes almost indistinguishable from the brown, dried grassland surrounding it. Creatures still come to the pools to feed upon what they can find, and other creature come to feed upon them. Although mitigation banks seek to recreate this complex system, Dr. Bob Holland among other vernal pool scientist, maintain that mitigation banks do not replace the loss of the unique biotic structure of a natural pool.

Less than 10 percent California's historic vernal pool acreage remains. What percentage of the remaining vernal pools occur within the SIA/PR project? How will the loss of vernal pools in the SIA/PR impact the survival of species dependent upon them? Please analyze the potential impact on vernal pool of the introduced invasive weeds and the non-native plants, which have the potential to choke-out much of the vernal pool flora.

Grasslands within the SIA/PR support foraging habitat for birds that must be surveyed. Several species of concern, including raptor species, the burrowing owl and the try-colored blackbird are among these foragers. Wetlands within the area support migratory fowl and fisheries that must be surveyed. Are the riparian and wetland resources utilized by or do they have the potential to be utilized by salmon and steelhead populations? Will alterations to drainage and hydrology proximate to conservation have a detrimental effect on riparian and vernal pool function?

Mitigation measures to secure vernal pool conservation areas within the SIA/PR from degradation must clearly demonstrate their effectiveness. The deterioration of preservation and mitigation sites within other Placer County developments was, in part, the impetus for The Placer County Conservation Plan (PCCP). Even if the PCCP is not yet adopted, a considerable effort has gone into developing the PCCP and it provides guidelines that are applicable to this EIR. For instance, EIR must provide a good indication of where development would be causing losses of environmental quality and biodiversity that would be an irreplaceable loss for the community, and that would complicate future, perhaps more sensible development.

Will the development of the SIA/PR introduce numerous non-native species into the conservation preserves within the SIA/PR and the proposed PCCP Area Preserve? There will be improved conditions for these invaders through runoffs of fertilizer, water, trash, and construction debris. How will this fact impact the short and long term conservation values conservation areas and mitigation sites?

Invasive range from noxious weeds like *Euphorbia terracina* to argentine ants and an unidentified, invasive snail, and more are likely to follow. The proposed development will likely introduce argentine ants into the PCCP Preserve. These ants will drive away coast horned lizards that feed only on native ants. The impacts of introductions of both non-native plants and insects must be analyzed by the EIR for the proposed project and mitigated. In the case of insects, impacts favoring argentine and other non-native ants generated by the proposed project may reach deep into areas designated for wildlife preservation, and these impacts must be analyzed and mitigated. Measures for control of runoff and control of invasive species must be included in the design of the proposed project. The proposed project should control for the spread of argentine ants as well.

The SIA/PR is on the eastern edge of the Pacific flyway. Having homes and large office buildings in a highly trafficked flyway will likely result in bird deaths due to bird strikes on windows. What migratory fowl and raptor population deaths are likely to occur? This impact of these losses to bird populations must be analyzed by the EIR and mitigated to the extent practical. The PCCP lands adjacent to the proposed SIA are designated as both a wildlife preserve and a wildlife corridor. Will the impacts of the proposed project on wildlife movements through the area be analyzed and mitigated?

#### Quality of Life

How significant is traffic congestion to a high quality of life? The Placer County Transportation Commission has done extensive research on levels of service for traffic circulation and its impact on quality of life measures. Please describe the Commissions work in this regard and work by industry experts. Quality of life measures and their associated costs should be evaluated for loss-of-work time value, loss of recreational time value, mental and physical health impacts, among other factors.

How will the failure of Measure M affect traffic function at build out of the SIA/PR? Please include an analysis of likely level of service impacts to current and future residents of Placer County, the region and to transients. As service levels decline will Placer County businesses and recreation purveyors experience a decline in users?

With GPS support, drivers are increasingly abandoning congested freeways and arterial ways and utilizing neighborhood streets to reach a destination more expeditiously. How has this phenomenon impacted the peace, quiet, quality of life and safety of neighborhoods throughout Placer County? Which existing neighborhood streets will be utilized by drivers who with GPS, who avoid congestion as the SIA/PR at build out?

#### University

The new University is a keystone feature of the SIA/PR. Please identify sources of funding for the University. Will the County allow the SIA/PR to pull building permits for residential and commercial uses prior to securing funding for the University? Does the County have any mechanism in place to ensure that SIA/PR does not build out without the University?

Educational and parking facilities at the Sacramento State and Sierra College home campuses are impacted, dilapidated and outdated because taxpayers have failed to pass the bond issues necessary to fund improvements to these institutions. What is the funding mechanism for the SIA/PR University? Is it likely that funding or a new campus will be available when funds to modernize existing facilities have been elusive?

Developers across California have secured development approvals with promises of university facilities. The County is “developer” promising a university here, Please provide examples of communities where universities and new development have built-out. What taxpayers funded costs are anticipated to secure a university? Will the County offer developer incentives to secure university? And how will the County recapture direct and indirect costs of these incentives if the University does not materialize?

#### Water

The NOP makes no reference to California’s prolonged drought and how future drought episodes will affect build-out of the SIA/PR and the Placer County General Plan, which anticipates 56,000 new

housing units. What measures does the SIA/PR propose to respond to a drought situation that may or may not resolve over time? Is groundwater an anticipated source of water for any elements of the SIA/PR development? What impact would use of ground water have on wildlife habitat, aquifers and to existing groundwater users? Will the SIA/PR employ conservation technologies to mitigate for drought and to protect current users and provide an adequate water supply for the future? If the proposed project is designed to use reclaimed water, which is too salty for humans to drink, we note that the sensitive native vegetation not known to be extensively salt tolerant or hydrophilic. If reclaimed water is to be used for landscaping, those impacts should be analyzed as well and mitigated L

#### Reimbursement

The County is acting as “designer/developer” for the SIA/PR. In this role, the County has produced a wide range of studies and analyses in the manner that any private developer would have undertaken to demonstrate if the project is profitable. The County has pledged to Placer County taxpayers that it will recapture funds expended on the SIA/PR predevelopment analyses from the future developer. Please identify all studies the County has completed for the PIA/PR development. What is the total cost of the SIA/PR project analyses to date? These costs must include direct costs for County staff and consultants and the indirect costs such as the forgone staff capacity for other critical projects in the County. What mechanism will the County employ to secure reimbursement funds from a future developer? Will there be transparency so that community members can evaluate the reimbursement against actual costs?

#### Conclusion

Since the 1980's, the urbanization of SIA/PR has been a vision for Placer County. Coincidentally, as conceived in the NOP, the SIA/PR looks a lot like a 1980's development. Does the SIA/PR project, as designed, promise the best of the human economy and the best for the natural ecology?

Placer County is in the driver's seat for the SIA/PR development. Will the County take a leadership role to implement Statewide goals for GHG emissions? Will the County create a project that serves the all members of the public who have entrusted them to preserve and protect resources so that all may enjoy a sustainable and livable future? Is the County envisioning a community that reflects State policies and incorporate contemporary design to meet de-carbonization targets? This is a responsibility. We should not be looking at yet another development like those across the County that compromise quality of life and a sustainable future. At a minimum, the County, acting as developer as it is here, should be beating the drum for a project that makes the progressive communities in Davis, CA look "old-school". If development in the wetland and farmland habitat of west Placer is inevitable – this is an opportunity for Placer County, to create something progressive, exciting and green – a SIA/PR that will put Placer County on the state, national and global map as a THE place for green innovation and livability.

The market analysis addresses the SIA/PR challenges – including infrastructure costs and the "image" problems of the area. Would not a transit friendly, compact, pedestrian and family friendly, solar driven, zero carbon footprint community that supports a true jobs/housing balance be a way to overcome the image and infrastructure constraint challenges? Because greenhouse gas is jeopardizing our very existence and because State and Federal policy seeks local government cooperation to adapt and implement decisions that may change the frightening trajectory we are on, Placer County must demonstrate cooperation with Federal and State government policy and exhibit leadership and civic responsibility by creating a very smart-growth community in the SIA/PR.

Thank you for the opportunity to comment.

Sincerely,

Leslie Warren

Auburn, CA



**WESTERN PLACER**  
WASTE MANAGEMENT AUTHORITY

*PAUL JOINER, LINCOLN, CHAIR*  
ROBERT WEYGANDT, PLACER COUNTY  
SUSAN ROHAN, ROSEVILLE  
JACK DURAN, PLACER COUNTY  
GEORGE MAGNUSON, ROCKLIN  
KEN GREHM, EXECUTIVE DIRECTOR

December 16, 2016

Shirlee Herrington  
Environmental Coordination Services  
Community Development Resources Agency  
County of Placer  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

SENT VIA U.S. MAIL and EMAIL: [cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov)

**RE: SUNSET AREA PLAN/PLACER RANCH SPECIFIC PLAN PROJECT NOTICE  
OF PREPARATION**

Dear Ms. Herrington:

The Western Placer Waste Management Authority (WPWMA) appreciates the opportunity to review and provide comments on the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the Sunset Area Plan (SAP)/Placer Ranch Specific Plan (PRSP) Project.

The WPWMA is a regional agency established in 1978 by the County of Placer and the cities of Roseville, Rocklin and Lincoln (Member Agencies) governed by a Board of Directors comprised of elected officials from each of the Member Agencies. The WPWMA provides recycling and waste disposal services to those communities as well as the cities of Auburn and Colfax and the Town of Loomis. The WPWMA also provides waste disposal services to individuals, business entities and other governmental agencies in and around Placer County. The WPWMA's facilities, located at Athens Avenue and Fiddymont Road, are centered in the Sunset Industrial Area. The WPWMA's properties total nearly 960 acres of which, approximately 800 acres are entitled for landfilling and 320 acres are used for active solid waste operations.

The WPWMA's facilities include the Western Regional Sanitary Landfill (WRSL) (the only active landfill in Placer County), a Materials Recovery Facility and compost facility, recycling drop-off and buy-back center and permanent household hazardous waste collection facility. The WPWMA's facilities provide for environmentally protective and sanitary disposal of solid wastes and ensure that municipalities, businesses and individuals utilizing the facility continue to comply with state and federal laws related to the diversion of materials from landfilling and the safe and proper handling of household hazardous wastes.

In acknowledgement of the critical importance of these services to the residents and businesses within the incorporated and unincorporated areas of the county, the Placer County Board of Supervisors established the following policy with respect to adjacent

*RECYCLING AND DISPOSAL MADE EASY*

11476 C AVENUE AUBURN, CA 95603  
(916) 543-3960 / (916) 543-3990 FAX  
[WWW.WPWMA.COM](http://WWW.WPWMA.COM)

land uses which was memorialized in the Placer County General Plan adopted on August 16, 1994 and subsequently updated on May 21, 2013:

*“When considering land use changes in the vicinity of a landfill operation, the County shall consider the landfill as the dominant land use in the area. In order to protect these facilities from incompatible encroachment, new residential land uses shall be separated from the property lines of active and future landfill sites by a buffer of one mile. Such buffers do not apply to closed landfills or solid waste transfer stations. Other uses will be required to provide buffers as described in Table 1-5<sup>1</sup>. The intent of this policy is to prohibit the creation of new parcels for residential use within one mile of the landfill; not to prohibit construction of a residence on an existing legal building site within this area.”<sup>2</sup>*

In addition to establishment of these buffers in the General Plan, the other WPWMA Member Agencies and the City of Auburn adopted resolutions recommending the Placer County Board of Supervisors provide no less than a one-mile buffer around the WRSL to prevent incompatible land uses, particularly residential development, from encroaching on the landfill<sup>3</sup>.

In both the SAP and PRSP, the County is proposing to allow residential development within one mile of the WRSL. Specifically, areas designated as ‘Entertainment Mixed Use’ and ‘Innovation Center’ in the SAP include a residential component and portions of the areas designated as ‘Residential’ (low, medium and high) and ‘Commercial Mixed Use’ (which includes a high density residential component) in the PRSP are less than one mile from the WRSL.

Given the possibility of increased residential development near the WRSL, the WPWMA is concerned about the potential impact this may have on the long-term viability of the WPWMA’s facilities and operations. The WPWMA therefore recommends that the DEIR include an evaluation of the potential project impacts such as odor, dust, noise, traffic and other aesthetic impacts on future residents, businesses and the proposed University as a result of their proximity to the WPWMA’s facilities. The WPWMA looks forward to working with the County to identify reasonable and cost-effective mitigation measures that can be incorporated into the project to lessen any identified impacts.

When considering potential mitigation measures, the WPWMA believes:

1. The DEIR should accurately calculate the cost of mitigation measures to determine feasibility and should identify the parties responsible for bearing the costs of proposed mitigation measures. If potential impacts would be caused by locating development adjacent to the WPWMA’s facilities, despite the limitations noted in the General Plan, the WPWMA believes the project, and not the WPWMA, should bear the initial and ongoing costs of these mitigation measures.

<sup>1</sup> Table 1-5 “Minimum Public Facility Buffer Zone Width”, Page 23 of the Placer County General Plan adopted on May 21, 2013 identifies a 5,280 foot buffer for residential development and 1,000 foot buffer for commercial development measured from the property line of an active or future landfill site.

<sup>2</sup> Section 4.G.11, Page 93 of Placer County General Plan adopted on May 21, 2013.

<sup>3</sup> City of Roseville Resolution 94-5, City of Rocklin Resolution 94-8, City of Lincoln Resolution 93-111 and City of Auburn Resolution 94-17.

2. The existing users of the WPWMA's facilities should not be expected to bear the cost of identified mitigation measures via increases to the rates the WPWMA charges its customers.
3. The project should be required in the chain of title to all properties, including the proposed University, commercial and residential components, to formally acknowledge the WPWMA's facilities and operations as critically important public infrastructure and that the proposed project will not hinder the WPWMA's ability to continue to operate or preclude the ability of the WPWMA to expand any of its operations on any of its properties.
4. Disclosure statements should be provided to, and acknowledged by, any future residents, businesses or other users located within the proposed project area regarding their proximity to the WPWMA's facilities and any potential impacts associated with its operations.

Additionally, the WPWMA has the following comments regarding specific sections of the NOP:

1. The Land Use Diagram on page 6 redefines the land use encompassing the WPWMA's approximately 960 acres as 'Eco-Industrial'. On page 5 of the NOP, this land use is defined by the following:

*"Eco-Industrial (EI) supports integrated industrial and manufacturing uses focused on alternative waste-to-energy technologies, recovery and reuse of solid waste, and solid waste-related research and development, potentially in conjunction with the nearby waste management facilities and universities."*

While the WPWMA appreciates the intent of this reclassification of the land use for its properties as it aligns with the WPWMA's conceptual future operational plans, the definition omits sanitary landfill operations and is vague on solid waste processing operations (such as composting), both of which are core functions of the WPWMA's facilities. As such, the WPWMA recommends that the definition be revised to specifically include "landfilling and solid waste-related processing and recycling operations".

2. The WPWMA recommends recalculation of the numbers presented in Table 1 on page 7 for the Eco-Industrial area to more accurately reflect potential conditions given that a significant portion of the WPWMA's property is utilized for landfilling and other solid waste-related operations.
3. The Utilities section on page 8 identifies the WPWMA's facilities as 320 acres. The WPWMA's active operations encompass 320 acres; the WPWMA's properties total nearly 960 acres.
4. The Potential Environmental Impacts section related to Air Quality identified on page 12 identifies existing land uses as potential sources of odor but only identifies the WRSL. Previous odor studies conducted by the WPWMA suggest numerous other odor sources, in addition to the WPWMA's facilities, exist in and around the project area. These include, but are not limited to, several

wastewater treatment plants, a biomass facility and livestock operations. The WPWMA recommends that the DEIR include all potential odor sources in the vicinity of the project that may impact future residential and commercial occupants.

5. Page 14 of the NOP provides a brief summary of existing uses in the plan area. However, the summary does not identify the WRSL as the dominant land use and appears to downplay its prominence as a critical and necessary piece of infrastructure for the residents and businesses of Placer County. The WPWMA requests that its role as a vital regional utility and public service be identified and distinguished in its land use designation in the DEIR.

Thank you again for the opportunity to review the NOP for this project. The WPWMA looks forward to working with the County as it processes this project so as to insure the long-term viability of our operations and enable us to continue providing valuable public services to the residents and businesses of Placer County. Please contact Eric Oddo of my staff at (916) 543-3984 should you wish to discuss these comments.

Sincerely,



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Bill Zimmerman, P.E.  
Deputy Executive Director

CC WPWMA BOARD OF DIRECTORS