

CHAPTER 2 RESPONSES TO COMMENTS

This chapter contains comment letters received during the public review period for the Draft EIR, which concluded on January 3, 2019. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIR.

Table 1-1 in Chapter 1, Introduction, presents the list of commenters, including the binomial designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

A public hearing to receive comments on the Draft EIR was held on December 13, 2018 during the regular meeting of the Placer County Planning Commission. One person provided comments discussing the need for affordable housing in the project area and no comments regarding the environmental effects of the proposed project or the content of the Draft EIR were received at the public hearing.

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Comment Letter A



EDMUND G. BROWN JR.
Governor

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH



KEN ALEX
DIRECTOR

January 3, 2019

Paul Breckenridge
Placer County
2855 Second Street
Auburn, CA 95603

Subject: Placer County Government Center Master Plan Update
SCH#: 2017092020

Dear Paul Breckenridge:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on January 2, 2019, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

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A-1

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
1-916-322-2318 FAX 1-916-558-3184 www.opr.ca.gov

Responses to Comments

Document Details Report State Clearinghouse Data Base

SCN#	2017092020		
Project Title	Placer County Government Center Master Plan Update		
Lead Agency	Placer County		

Type	EIR	Draft EIR
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Description Placer county proposes to adopt the Placer County Government Center Master Plan Update to govern demolition and new construction at the PCGC for the next 20 years. The plan organizes the PCGC into four land use districts and anticipates development of approx 485 residences, 410,000 sf of new office space, a 30,000 sf event center, 182,600 sf of new commercial space, and a 101-room hotel.

Lead Agency Contact

Name	Paul Breckenridge		
Agency	Placer County		
Phone	530-889-6893	Fax	
email			
Address	2855 Second Street		
City	Auburn	State	CA
		Zip	95603

Project Location

County	Placer
City	Auburn
Region	
Lat / Long	
Cross Streets	Beil Rd, Atwood Rd, Richardson Dr
Parcel No.	several
Township	

	Range	Section	Base
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Proximity to:

Highways	49
Airports	Auburn Municipal
Railways	
Waterways	Ophir Canal, Deadman's Ravine
Schools	Rock Creek ES
Land Use	LU: Mixed use, open space; Z: Office professional, commercial planned development, heavy commercial, medium density residential, open space

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Economic/Job; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Water Supply; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Central Valley Flood Protection Board; Department of Conservation; Department of Fish and Wildlife, Region 2; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; Caltrans, District 3 N; Department of Housing and Community Development; Native American Heritage Commission; Regional Water Quality Control Bd., Region 5 (Sacramento); State Water Resources Control Board, Division of Drinking Water; Air Resource Board

Date Received	11/19/2018	Start of Review	11/19/2018	End of Review	01/02/2019
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Response to Comment Letter A

State Clearinghouse
Scott Morgan, Director
January 3, 2019

A-1 This comment states that the Draft Environmental Impact Report (EIR) was provided to selected state agencies, confirms the end date of the comment period, and provides contact information for the State Clearinghouse.

The comment does not address the environmental effects of the project or the content of the Draft EIR. No response is required.

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STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUNDO G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 3
703 B STREET
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PHONE (530) 741-4233
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TTY 711
www.dot.ca.gov/district3



Making Conservation
a California Way of Life.

January 2, 2019

GTS# 03-PLA-2018-00351
03-PLA-049 PM 6.259
SCH# 2017092020

Shirlee Herrington
Placer County Community Development Resource Agency
3091 County Center Drive, Suite #190
Auburn, CA 95603

Placer County Government Center Master Plan Update

Dear Shirlee Herrington:

Thank you for including the California Department of Transportation (Caltrans) in the environmental/application review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network.

B-1

The project will update the 1993 Comprehensive Facilities Master Plan for the Placer County Government Center (PCGC) and establish a long-term vision and ongoing facilities-planning guide for capital improvement projects at the PCGC campus with a 20-year planning horizon. The project area is located west of State Route 49, south of Bell Road, and north of Atwood Road in Auburn, CA. The following comments are based on the Draft Environmental Impact Report (DEIR) received.

Traffic Operations

Figure 21 shows 520 AM peak hour trips and 450 PM peak hour trips. This is not realistic, as it is anticipated that drivers will divert the Willow Creek Drive intersection after sitting through multiple signal cycles. We recommend that the construction of northbound dual left-turn lanes at Willow Creek Drive should be included as a mitigation measure.

B-2

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability."

Ms. Shirlee Herrington, Placer County Community Development Resource Agency
January 2, 2019
Page 2

Mitigation Measure 1 - Widen SR 49 north of Bell Road to five lanes

- The Auburn Creekside development is expected to widen the highway to three northbound lanes (plus an auxiliary lane) between Bell Road and Rock Creek Road. Currently, there is no funded project that will provide a third lane southbound approaching Bell Road. A third southbound lane would extend from Education Street to Bell Road and would extend through the intersection to connect to the existing three southbound lanes. A reasonable length of southbound right-turn lane would improve operations of the highway segment and the intersection as an interim improvement. Caltrans does not have a specific standard for right-turn volumes that require a right-turn lane, but the 200 VPH in the AM peak hour shown in Figure 17 strongly suggests that one will be needed, in addition to the third through lane.

B-3

Mitigation Measure 4 - Optimize the signal timings at the SR 49/Kemper Road/New Airport Road intersection

- Placer County has identified improvements to this intersection in their improvement plan. Signal retiming can only do an increment of improvement. We recommend the construction of a separate left-turn lane at the Kemper Road leg as a mitigation measure to significantly improve operations at this intersection.

B-4

Traffic Forecasting and Modeling

As per the Transportation Impact Study, two components of the proposed Master Plan Update are:

- Construction of a 100-unit multifamily residential (MFR) development
- Construction of a new Health & Human Services (HHS) building.

B-5

The trip generation appears accurate for the 100-unit multifamily residential (MFR) development, but for the new Health & Human Services (HHS) building with a proposed net change at the PCGC campus of 267 employees (page 52), the trip generation reported seems to be low during the PM peak hour. Please revise or provide explanation.

Please provide our office with copies of any further actions regarding this project or future development of the property. We would appreciate the opportunity to review and comment on any changes related to this development.

B-6

If you have any question regarding these comments or require additional information, please contact David Smith, Intergovernmental Review Coordinator for Placer County, by phone (530) 634-7799 or via email to david.j.smith@dot.ca.gov.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability."

Responses to Comments

Ms. Shirlee Herrington, Placer County Community Development Resource Agency
January 2, 2019
Page 3

Sincerely,


✉

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

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and mobility"*

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Response to Comment Letter B

California Department of Transportation
Kevin Yount, Branch Chief
January 2, 2019

B-1 This comment introduces the California Department of Transportation (Caltrans) and summarizes the proposed Placer County Government Center (PCGC) Master Plan Update.

The comment does not address the environmental effects of the project or the content of the Draft EIR. No response is required

B-2 Referring to Figure 21 in the Transportation Impact Study, the comment states that the 520 trips in the AM peak hour and 450 trips in the PM peak hour trips are unrealistic because drivers would divert onto Willow Creek Drive after sitting through multiple signal cycles. The comment recommends that the proposed project include a mitigation measure of construction of dual northbound left-turn lanes at Willow Creek Drive.

Figure 21 shows the stated traffic volumes on the northbound left-turn movement at the SR 49/Atwood Road intersection under cumulative plus master plan conditions. In response to this comment, Fehr & Peers completed a sensitivity analysis to determine whether diverting some of the northbound left-turn volumes at the Atwood Road intersection would significantly impact the Willow Creek Drive intersection. This analysis shifted some of the forecasted growth in the northbound left-turn volume at Atwood Road to Willow Creek Drive under cumulative plus master plan conditions.

During the AM peak hour, Fehr & Peers tested reducing the northbound left-turn at Atwood Road from 520 trips to 400 trips. This would shift 120 trips to northbound through trips at Atwood Road and add 120 trips to the northbound left-turn at Willow Creek Drive, as recommended in the comment. The 400 remaining northbound left-turn trips at Atwood Drive is considered reasonable given that the existing volume is 347 vehicles (see Figure 6 in the Transportation Impact Study) and some growth on this movement is expected as the result of the background traffic growth and new trips generated by the proposed master plan. This results in increasing the northbound left-turn volume at Willow Creek Drive from 210 trips to 330 trips under cumulative plus master plan conditions. With this shift, the Fehr & Peers sensitivity analysis showed delay at Atwood Drive would reduce slightly from 45.6 seconds per vehicle (LOS D) to 44.7 seconds per vehicle (LOS D); and delay at Willow Creek Drive would increase slightly from 27.7 seconds per vehicle (LOS C) to 28.2 seconds per vehicle (LOS C). This shift in traffic does not result in a change in the LOS grades presented in the Transportation Impact Study or Chapter 10 of the Draft EIR. Therefore, this hypothetical shift in traffic would not result in a change in the significant impact findings during the AM peak hour.

During the PM peak hour, Fehr & Peers tested reducing the northbound left-turn at Atwood Road from 450 trips to 300 trips. This would shift 150 trips to northbound through trips at Atwood Road and add 150 trips to the northbound left-turn at Willow Creek Drive. The resulting 300 northbound left-turn trips at Atwood Road is a level that can more reasonably be served by a single left-turn lane, as recommended in the comment. The resulting 380 northbound left-turn trips at Willow Creek Drive presents a scenario where more traffic growth occurs at Willow Creek Drive than Atwood Road. With this shift, the Fehr & Peers sensitivity analysis showed delay at Atwood Road would be reduced from 99.4 seconds per vehicle (LOS F) to 86.0 seconds per vehicle (LOS F); and delay at Willow Creek Drive would increase from 34.4 seconds per vehicle (LOS C) to 41.7 seconds per vehicle (LOS D). The SR 49/Atwood Road intersection would continue to operate at an unacceptable LOS F. Impact 10-8 in the Draft EIR acknowledges this significant and unavoidable impact. The SR 49/Willow Creek Drive intersection would operate at LOS D, which is considered acceptable per the Significance Criteria for Caltrans facilities as described in Chapter 2 of the Transportation Impact Study and Chapter 10.3 of the Draft EIR. Therefore, this hypothetical shift in traffic would not result in a change in the significant impact findings during the PM peak hour.

As described above, the hypothetical shift in traffic suggested by the comment would not result in a change to the significant impact findings in the Draft EIR. The SR 49/Willow Creek Drive intersection during the AM or PM peak hour would not be significantly impacted with the suggested shift in traffic. Therefore, additional mitigation measures are not required, and imposing additional mitigation measure requirements, such as northbound dual left-turn lanes at Willow Creek Drive as suggested in the comment, would not be consistent with case law standards establishing that mitigation must have a nexus to and be roughly proportional to the project's impacts, as noted in CEQA Guidelines Section 15041. The comment does not provide evidence or analysis that the construction of northbound dual left-turn lanes at Willow Creek Drive is necessary to reduce the project's impact to a less-than-significant level.

- B-3** Referring to Mitigation Measure 1 in the Transportation Impact study (presented as Mitigation Measure 10d in the EIR), the comment states that the Auburn Creekside development is expected to widen SR 49 to three northbound lanes (plus auxiliary lane) between Rock Creek and Bell Road, but there is no funding for an additional southbound lane between Education Street and Bell Road. The comment states that the addition of a reasonable length of a southbound right-turn lane would improve operations of the highway segment as an interim improvement, noting that the 200 right-turning vehicles in the AM peak hour shown in Figure 17 of the Transportation Impact Study indicates that a right-turn lane would be needed, in addition to the third through-lane.

As discussed on page 10-32 of the Draft EIR, at full buildout, the proposed PCGC Master Plan Update is expected to add 2,300 vehicles to the segment of SR 49 north of Bell Road. This would increase the volume-to-capacity ratio on this segment by 0.07, which is considered a significant impact under the Caltrans significance criteria. The Transportation Impact Study identifies that the addition of a third northbound lane on SR 49 from Bell Road to north of Education Street would improve the level of service (LOS) on this segment and would reduce impacts to less than significant by providing sufficient capacity to accommodate the anticipated project-generated traffic. Because the identified improvement would ensure that impacts remain less than significant, imposing additional mitigation requirements would not be consistent with case law standards establishing that mitigation must have a nexus to and be roughly proportional to the project's impacts, as noted in California Environmental Quality Act (CEQA) Guidelines Section 15041. The comment does not provide evidence or analysis that the third northbound lane required to be constructed under Mitigation Measure 10d would be insufficient to reduce the project's impact to less than significant.

Further, the comment is incorrect that funding has not been identified for widening SR 49 between Rock Creek and Bell to six lanes. This improvement is included in the County's CIP. All future projects in the Auburn/Bowman CIP area, including projects undertaken in implementation of the proposed PCGC Master Plan Update, would be required to contribute a fair share amount to these improvements, consistent with the Auburn/Bowman CIP.

B-4 Referring to Mitigation Measure 4 in the Transportation Impact study (which is presented as Mitigation Measure 10b in the EIR), the comment states that Placer County has identified improvements to the SR 49/Kemper Road/New Airport Road intersection, and that signal improvements can only provide an increment of improvement. Caltrans recommends construction of a separate left-turn lane at the Kemper Road leg to improve intersection operations.

Draft EIR Table 10-4 shows that the SR 49/Kemper Road/New Airport Road intersection currently operates at LOS D in the AM peak hour and LOS F in the PM peak hour. Table 10-5 shows that, under existing conditions plus full buildout of the PCGC Master Plan Update, the AM peak hour LOS would decrease to LOS E and delay would increase by 15.7 seconds, and in the PM peak hour, the intersection would continue to operate at LOS F and delay would increase by 34.1 seconds. Draft EIR Mitigation Measure 10b is identified to address the impact of full buildout of the Master Plan Update at the SR 49/Kemper Road/New Airport Road intersection. As stated on Draft EIR page 10-24, the signal timing optimization recommended in Mitigation Measure 10b would restore operations to LOS D during the AM peak hour, and improve operations to LOS E during the PM peak hour. Thus, this mitigation is sufficient to reduce the impacts at this location

Responses to Comments

to less than significant under existing plus project conditions. Additional improvements to the intersection are identified in Mitigation Measure 10k, and additional signal timing optimization is recommended under Mitigation Measure 10o. These measures address impacts at this location under the cumulative plus project scenario. The comment does not provide evidence or analysis that the signal timing optimization recommended under Mitigation Measure 10b would be insufficient to reduce the project's impact to less than significant. Additionally, the funding identified in the Auburn/Bowman CIP is not sufficient to provide a separate eastbound left-turn lane at this location, as recommended in the comment.

B-5 This comment states that the trip generation for the multifamily residential project seems accurate, but that the trip generation from the Health and Human Services building during the PM peak hour appears to be low and requests clarification.

The trip generation estimates for the proposed Health and Human Services building are based on the trip generation rates for government office buildings included in the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 10th Edition*, the state-of-the-practice source for trip generation data. The weighted average trip generation rate for government office (land use code 730) as documented in the *Trip Generation Manual, 10th Edition* is as follows:

- 7.45 vehicle trip ends per employee per day
- 1.10 vehicle trip ends per employee during the AM peak hour (adjacent street traffic between 7 and 9 a.m.)
- 0.71 vehicle trip ends per employee during the PM peak hour (adjacent street traffic between 4 and 6 p.m.)

In addition, as stated on page 52 of the Transportation Impact Study, trip generation is calculated based on the number of employees. This provides a greater degree of accuracy than using the amount of building floor area due to the factors described on page 52 of the Transportation Impact Study.

B-6 The comment requests that the Caltrans office remain informed of any further actions or future changes regarding the PCGC property, and provides contact information.

The comment does not address the project's environmental impacts nor the content of the Draft EIR. No response is required. Placer County will continue to coordinate with Caltrans regarding development of the PCGC property and other development in Placer County that may affect Caltrans facilities.



110 Maple Street, Auburn, CA 95603 • (530) 745-2330 • Fax: (530) 745-2373 • www.placerair.org

Erk C. White, Air Pollution Control Officer

December 31, 2018

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

Subject: Review of the Draft Environmental Impact Report for the Placer County Government Center Master Plan Update

Dear Ms. Herrington:

The Placer County Air Pollution Control District (District) thanks you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) prepared for the proposed Placer County Government Center Master Plan Update. The District has the following comments on the Project's DEIR for your consideration.

C-1

1. The Local Ambient Air Quality section (page 12-7) incorrectly states that PM_{2.5} is not measured at the Auburn monitoring station, located at 11645 Atwood Road. PM_{2.5} is in fact measured at this site.

C-2

This section also incorrectly states that the Sacramento Metropolitan Air Quality Management District (SMAQMD) operates the Auburn monitoring station. Placer County Air Pollution Control District operates this station, not SMAQMD.

C-3

2. Page 12-14 of the DEIR incorrectly states that Table 12-5 includes District-recommended CO thresholds. The District does not recommend any significance thresholds for CO emissions and there are no such thresholds in Table 12-5.

C-4

3. The District recommends that the following rules be included in the PCAPCD Rules and Regulations section (page 12-16). These rules pertain to the allowable appliances for residential and commercial projects.

Rule 225 – Wood Burning Appliances: Rule 225 is intended limit emissions of particulate matter entering the atmosphere from the operation of a wood burning appliance.

C-5

Rule 247 – Natural Gas-Fired Water Heaters, Small Boilers and Process Heaters: Rule 247 is intended to limit the emissions of oxides of nitrogen (NOx) from the use of natural gas-fired water heaters, small boilers and process heaters.

4. For the purposes of determining net operational emissions for a new/replacement project, the

C-6

Ms. Shirlee Herrington
December 31, 2018
Page 2 of 3

District recommends using the buildout year of the new/replacement project as the operational year for calculating the existing project's operational emissions. In other words, the District recommends that the emissions of the proposed project be compared to what the current project's emissions *would be* in the year the proposed project is estimated to be completed, rather than to the *current* emissions. This allows a fair comparison that takes into account changes in net emissions that are independent of the proposed project, such as changing fuel and building standards.

C-6
Cont.

Specific to the proposed Placer County Government Center Master Plan Update, the District recommends using the operational year of 2021 to calculate the criteria pollutants emissions for both the current and proposed Health and Human Services building. Currently, the year 2017 is used to calculate current emissions, and 2021 is used for the proposed emissions.

5. The Carbon Monoxide Hotspot section (page 12-43) incorrectly references the District's recommendation for CO hotspot analysis. The District's *CEQA Air Quality Handbook* recommends the following criteria to determine a CO hotspots analysis is warranted:

When a project's CO emissions from vehicle operation are more than 550 lbs/day **and** if a project would degrade any intersection in the project vicinity from an acceptable peak-hour LOS to unacceptable LOS **or** if a project would substantially worsen an already existing unacceptable LOS on any intersection in the project vicinity¹.

C-7

In addition, page 12-45 of the DEIR incorrectly references Table 12-18: CALINE4 Predicted Carbon Monoxide Concentrations as Table 12-17. The same sentence references the maximum 1-hour CO concentration as 2.8ppm rather than 2.4ppm as shown in Table 12-18 and in the model output found in Appendix G. The District recommends the following changes:

"As shown in **Table 12-18**, maximum CO concentration predicted for the 1-hour averaging period would be **2.4 ppm**, which is below the state 1-hour CO standard of 20 ppm."

6. As discussed in the DEIR, the District recommends that the significance of greenhouse gas (GHG) emissions be determined based upon a comparison meeting either the efficiency threshold of 27.3 MT CO₂e per 1,000 square feet for nonresidential uses or 5.5 MT CO₂e per capita for residential uses.

C-8

In the Operational Impacts section of the PCGC Mater Plan Update for Impact 13-1 (page 13-33), square feet are used as the metric for calculating the efficiency threshold. However, the "per capita" metric is used in the final calculation. The District recommends the following changes:

¹ Placer County Air Pollution Control District CEQA Air Quality Handbook, Section 4.4 "Determining Local CO Emission Impact at Roadway Intersection", page 37, published in August 2017
<http://www.placerair.org/~media/apcd/documents/planningand%20use%20and%20ceqa/ceqahandbook/chapter4-2017ceqahandbook.pdf?la=en>

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Ms. Shirlee Herrington
December 31, 2018
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"For a mixed-used type project, the PCACPD recommends that significance is determined based upon a comparison meeting either the efficiency threshold of 27.3 MT CO₂e per 1,000 square feet for nonresidential uses or 5.5 MT CO₂e per capita for residential uses (PCACPD 2017). Based on the net operational GHG emissions attributable to the proposed project of 8,169 CO₂e per year and the total square footage of nonresidential land uses to be developed of 454,600 square feet, the proposed project would result in 18.0 MT CO₂e per **1,000 square feet**, which is below the efficiency threshold of 27.3 MT CO₂e per **1,000 square feet** recommended by the PCACPD."

C-8
Cont.

7. The analysis of Impact 13-3: "Would the project make a cumulatively considerable contribution to emissions of greenhouse gases in the cumulative scenario?" compares the estimated MT CO₂e for the Health and Human Services (HHS) building and the Multifamily Residential project to the District's recommended de minimis level for greenhouse gases *individually*.

It is the District's recommendation that the impacts of the HHS building and the Multifamily Residential project be considered *cumulatively* in comparison to the District's recommended thresholds. This change would still result in a "less than significant" impact, but would be a more accurate representation of the cumulative impacts of Phase 1 emissions. The District suggests the following changes to the analysis found on page 13-43:

C-9

"Development of the Health and Human Services building and the Multifamily Residential project would **cumulatively** result in **992 MT CO₂e** per year, which would not exceed the 1,100 MT CO₂e per year threshold."

Thank you again for the opportunity to review and comment on the DEIR. If you have any questions, please feel free to contact me at 530-745-2376 or lmoores@placer.ca.gov.

Sincerely,



Lauren Moore
Air Pollution Control Specialist
Placer County Air Pollution Control District

Cc: Yushuo Chang, Planning and Monitoring Section Manager

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Response to Comment Letter C

**Placer County Air Pollution Control District
Lauren Moore, Air Pollution Control Specialist
December 31, 2018**

C-1 The comment introduces the Placer County Air Pollution Control District (PCAPCD) and subsequent comments.

The comment does not address the environmental effects of the project or the content of the Draft EIR. No response is required.

C-2 The comment states that the statement on page 12-7 (PM_{2.5} is not measured at the Auburn monitoring station) is incorrect, since PM_{2.5} is measured at that station.

The text on page 12-7 has been revised as suggested and as consistent with Draft EIR Table 12-2, which presents the PM_{2.5} monitoring data from the Auburn monitoring station.

C-3 The comment states that the PCAPCD, not the Sacramento Metropolitan Air Quality Management District, monitors the Auburn Monitoring Station.

The text on page 12-7 has been revised as suggested.

C-4 The comment states that page 12-14 states that Table 12-15 includes PCAPCD-recommended carbon monoxide (CO) thresholds; however, the PCAPCD does not have recommended CO thresholds, nor is it included in Table 12-15.

The text on page 12-14 has been revised to omit CO from the list of pollutants for which the PCAPCD has recommended thresholds, as suggested.

C-5 The PCAPCD recommends the addition of Rule 225 and 247 to the PCAPCD rules and regulations section on page 12-16.

Text summarizing Rules 225 and 247 has been added to pages 12-16 and 12-17 as suggested.

C-6 The PCAPCD recommends that the emissions of the proposed Health and Human Services building at full buildout be compared to the projected emissions of the existing Health and Human Services operation during the same year, instead of comparing the emissions in year 2021 of the proposed building with the current (year 2017) emissions.

The modeling to estimate the emissions associated with the existing buildings that house the Health and Human Services department has been revised to reflect 2021 conditions, as requested in this comment. Text in Chapter 12 has been updated to reflect the revised modeling. The impact remains less than significant.

Responses to Comments

C-7 The comment states that the PCAPCD’s recommended criteria for when a CO hotspot analysis is warranted is stated incorrectly. The comment also states that page 12-45 of the Draft EIR incorrectly references the table number and maximum 1-hour CO concentration when referring to the CALINE4 Predicted Carbon Monoxide Concentration. The comment provides specific recommended text revisions for page 12-45.

The text on page 12-43 identifying the PCAPCD’s recommended criteria for determining the need for a CO hotspots analysis has been revised as suggested. The referenced text on page 12-45 has also been revised as suggested.

C-8 The comment confirms that the Draft EIR applied the PCAPCD’s recommended significant thresholds regarding greenhouse gas emissions, but mis-stated the unit of measurement in the final sentence on page 13-33 by referring to “per capita” emissions rather than “per 1,000 square feet.” The comment provides specific recommended text revisions for page 13-33.

The text on page 13-33 has been revised as suggested.

C-9 The PCAPCD recommends that the impacts of the Health and Human Services building and the Multifamily Residential project be considered cumulatively in comparison to the PCAPCD’s recommended thresholds, rather than individually as is done in the Draft EIR, to provide a more accurate representation of the cumulative impacts of Phase 1 emissions. The comment also provides closing remarks and contact information.

As described in Chapter 1, Introduction, of the Draft EIR, the EIR provides a project-level analysis of the Health and Human Services building and a separate project-level analysis of the Multifamily Residential project. Thus it is appropriate to disclose the impacts of each project individually. However, the additional information requested by the PCAPCD has been added to the discussion of Impact 13-1 and Impact 13-3.

Comment Letter D

8 December 2018

Placer County CDRA
Environmental Coordination Services
3091 County Center Drive, Suite 1320
Auburn, CA 95603

Re: Draft EIR Comments
Placer County Government Center Master Plan

Thank for this opportunity to provide input on the Draft EIR for the County's Dewitt Center Master Plan. We own APN 051-070-009-000 and the parcel has an entitled project known as the "Atwood 80" Subdivision (PSUM20090417). Atwood 80 is an 80 acre 64 unit residential project and lies on the North side of Atwood Road directly West of the subject Placer County Government Center Master Plan. The project was entitled into the Dewitt Sewer within SMD 1.

We believe the proposed Master Plan is a good comprehensive plan and recommend its approval with some minor clarifications. The plan shows new sewers needed for the proposed development within the Dewitt and Caballo Circle areas. The "Atwood 80" sewer connection was previously anticipated to connect North of Dewitt, due, in part, to hydraulic sewer restrictions in that area. The proposed Master Plan alleviates those hydraulic restrictions. Connecting "Atwood 80" along Atwood Road (as shown in the attached schematic) is much more direct, requires less pumping and does not involve upsizing existing sewer lines along Wilson Road compared to routing the sewer around and North of the Dewitt Center. We are currently working with the Placer County Engineering Staff to better understand this option.

While this analysis is being completed, we request that the Placer County Government Center Master Plan acknowledge that the adjacent entitled properties like, Atwood 80, could connect into the new sewers if approved by Placer County Engineering.

Thank you for your time and consideration.

Jeff Dutra
Ron Meyer
Representing the Atwood 80 owners
220 Sacramento Street
Auburn, 95603

jeff.dutra@sbcglobal.net
ronmeyer@pacbell.net

D-1



**Atwood 80 Homeowners
Jeff Dutra and Ron Meyer
December 8, 2018**

D-1 The comment requests that the Placer County Government Center (PCGC) Master Plan Update acknowledge that adjacent entitled properties, like Atwood 80, could connect into new sewer infrastructure if approved by Placer County Environmental Engineering, noting that the proposed PCGC Master Plan Update would alleviate existing hydraulic restrictions in the area.

The comment does not address any environmental impacts associated with the proposed project. The PCGC Master Plan Update does not anticipate allowing neighboring development to connect to the sewer infrastructure within the project site. However, such connections are not precluded by the project. Any future connections would be subject to separate development review by Placer County.

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 mailing: P.O. Box 9207 • Auburn, CA 95604 office: 219 Maple St., Suite 200 • Auburn, CA 95603
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Victoria Blake
 Chief Executive Officer

December 28, 2018

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

RE: Placer County Government Center Master Plan
 Draft EIR

Ms. Herrington:

Thank you for allowing the community to give comment to the Placer County Government Center Master Plan EIR. Placer County lacks an adequate supply of workforce and affordable housing. As it is needed for the community to grow and prosper, we hope the need to meet the workforce and affordability requirements are taken seriously.

E-1

Table 3-2 in the project description should be amended to identify the USE of all of the buildings that were demolished – please describe what were they used for. We believe this information can be found in the August 2002 North Fork Associates Existing Conditions Report.

E-2

The report needs to acknowledge the 1994 Auburn Bowman Community Plan EIR that states affordable housing as a SIGNIFICANT impact (attached) because of a limited amount of multi-family zoned property in the long term. The impact is even greater than when this plan was adopted as much of the land zoned for multi family was developed as single family. The DeWitt campus may be the only viable option to provide affordable housing.

E-3



Responses to Comments

Impact 6-4 – we don't agree that it is less than significant because the Auburn Bowman Community Plan already identified that the affordable housing ratio is a significant and unavoidable impact.

E-4

Given the low wage jobs already created in the Auburn Bowman plan area and the projections for additional lower wage job creation in this report, 400 affordable units should be prioritized above all non-governmental site development. Additional development should not occur until the affordable units are completed.

E-5

The intent of the surplus land act is VERY clear and the County should explain why its not complying with the act. The Surplus Land Act says that when government does not need the land for its own purposes, priority shall be given to development of the land to provide affordable housing for lower income elderly or disabled persons or households, and other lower income households.

E-6

Affordable housing needs to come first. We are pleased to see the County honor its commitment from 2001 to replace the units at Bell Gardens after it was torn down. But 79 units are not enough. As mentioned in our letter to you dated September 30, 2016, we would like to see the County seize this extraordinary opportunity to designate at least 20% of the site for residential. Within this amount, at least 20 acres should be identified as multi-family housing with densities of 20 units per acre enabling a development of 400 units that could meet the criteria for tax credit funding.

E-7

In today's environment, reference to multi-family housing no longer means "affordable housing". The number of affordable units should be clarified. The report references that all of the multi-family housing will be rental housing. How will this be managed and who will own the property?

E-8

Chapter 18 reports that this development will be served by the Highway 49 sewer line where there is capacity. But the other sewer line has limited capacity and it is old.

Possible mitigation measures should include:

1. Where sewer or water capacity is limited and improvements to increase capacity are not funded, Affordable Housing receives priority for capacity over other non-governmental development on the PCGC site.

2. Additional affordable housing development shall not be delayed by, or burdened by the cost of, limited sewer or water capacity. Funding sources for off-site infrastructure serving affordable housing shall be identified and reserved.

E-9

Responses to Comments

Jobs increase:

On pages 18-22 says that Build out would increase governmental staff by 450. It also says there will be 141 new employees at HHS, but it is not clear if the 450 includes the 141. Where is the reference to how many employees the hotel would generate?

E-10

Thank you for allowing us to comment.

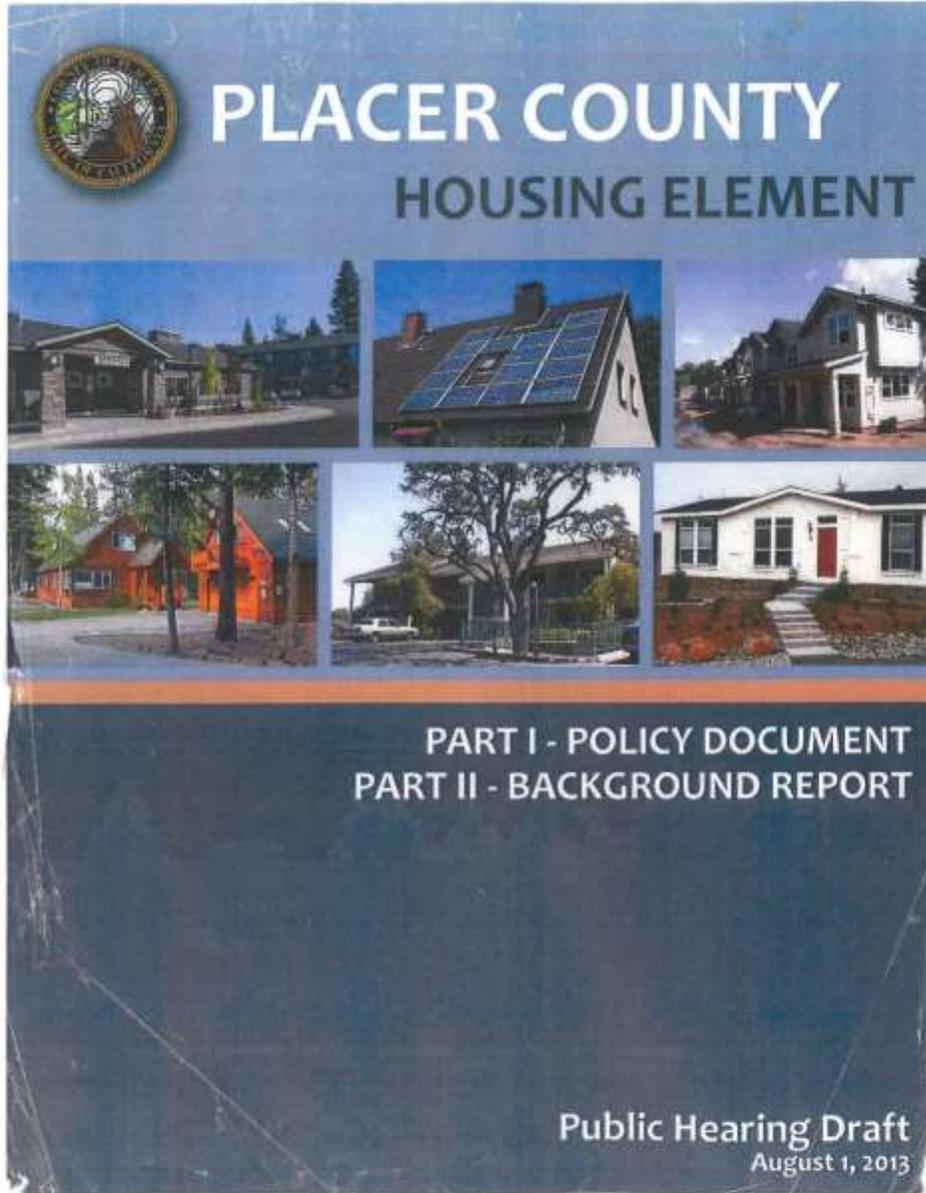
Sincerely,



Veronica Blake
Chief Executive Officer
Placer Community Foundation

VB/fd

Attachments



Auburn/Bowman

The Auburn/Bowman area can be characterized as a rapidly developing foothill community with a central urban downtown area and suburban development to the north and south, strip commercial development along the primary north-south road, Highway 49, and nodes of highway commercial activity to the east along Interstate 80.

More recent development of the Highway 49 corridor, especially between Dry Creek Road on the north and New Airport Road on the south, Dewitt Center to the west, and the Auburn Airport to the east, has resulted in the establishment of an office, commercial, and service-oriented urban area two to three miles north of the traditional center of the Auburn community.

This area now includes the hospital, airport, industrial centers, larger commercial facilities, county government complex, schools, parks, and a large number of multi- and single-family housing developments. This area has developed with urban-type development and has adequate infrastructure and services to handle higher-density housing. The County-owned Dewitt Center is strategically located in the center of North Auburn and is considered an appropriate affordable housing location. The County has proposed Program A-2, an update to the Dewitt Center Master Plan to identify sites appropriate for higher-density and mixed-use development.

Martis Valley

The Martis Valley area of Placer County consists of an area of land that is approximately 25,570 acres near the Town of Truckee in the central Sierra Nevada Mountains north of Lake Tahoe. Land use patterns consist of a wide range of urban and commercial areas, forest lands, public and private recreational areas and facilities, as well as areas designated for airport use.

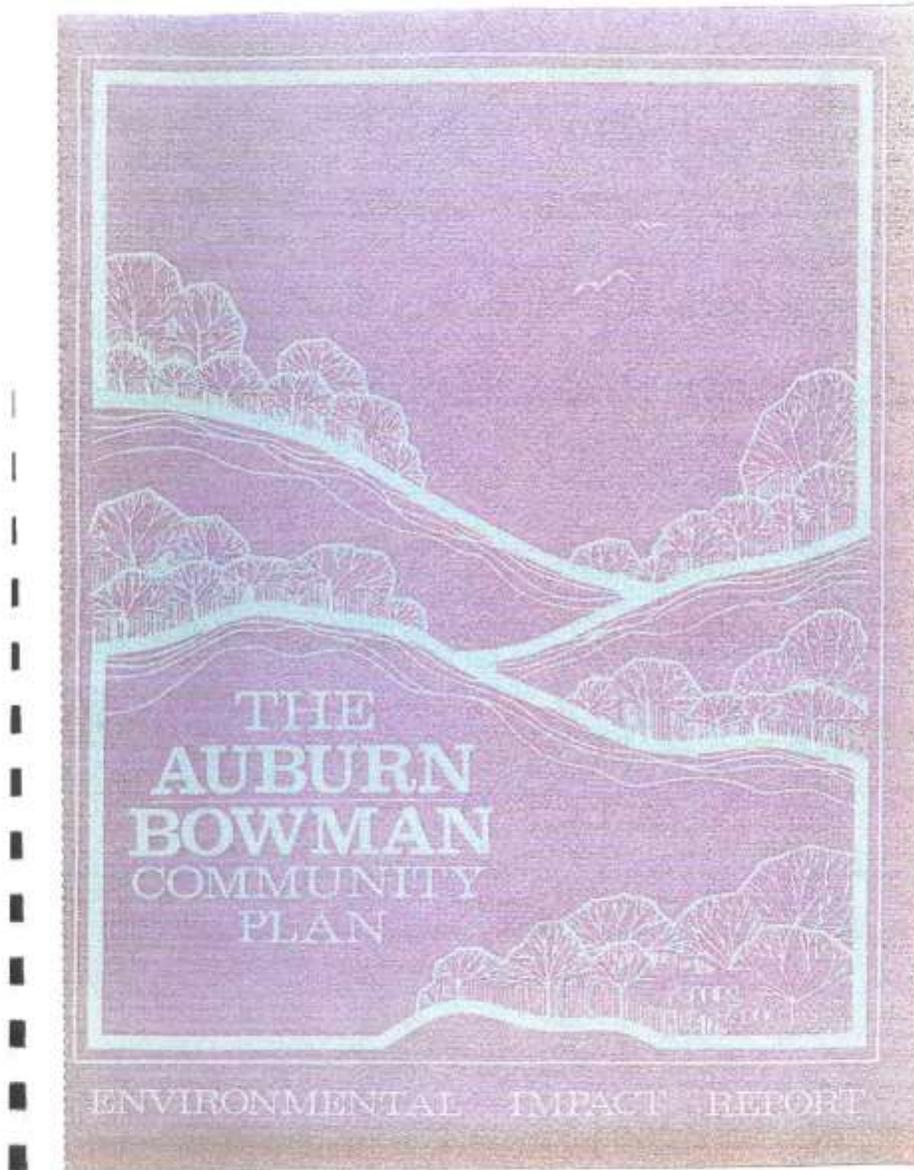
Existing residential communities within the Placer County portion of Martis Valley consist of Ponderosa Fallsides, Madewood Estates, Ponderosa Ranches, Sierra Meadows, Lahontan, Schaffer's Mill, Hopkins Ranch, and the Northstar-at-Tahoe resort community. The Northstar-at-Tahoe resort community consists of over 1,500 private homes and condominiums, some of which serve as rental properties. There is a workforce housing apartment complex, Sawmill Heights, at Northstar.

There is minimal undeveloped commercial land within the valley and several vacant multi-family housing parcels. Northstar-at-Tahoe, Lahontan, and Schaffer's Mill have workforce housing development requirements that are planned or under construction.

Sheridan

Sheridan is located in the northwest corner of the county near the Yuba County line. Highway 65 provides access to Wheeland to the north and the cities of Lincoln, Rocklin, Roseville, and Sacramento to the south. Sheridan is largely a rural residential community surrounded by agricultural uses and conservation lands.

Although a community plan was prepared in 1976 that would allow for a significant amount of new development around the Sheridan townsite, constraints on public sewer and water limit the potential to accommodate the urban levels of development. There is current capacity for 82 additional dwelling units within the townsite where water and public wastewater service and vacant multi-family zoned land are available.



3. Summary

The Summary Table in this section lists each potential impact expected as a result of implementation of the Community Plan and the measures recommended to mitigate them. These introductory paragraphs list the avoidable and unavoidable significant impacts and briefly describe areas of controversy and the issues yet to be resolved. A full discussion of each impact can be found in the various sections of this EIR.

Avoidable
Significant Impacts Which Can be Mitigated (Plan Alone)

The impacts which may result from implementation of the Community Plan within the unincorporated area alone which have the potential to be significantly adverse but which can be avoided are listed below.

HYDROLOGY / WATER QUALITY

- Impacts of recommended water quality protection facilities
- Impacts of detention facilities

BIOTIC RESOURCES

- Impacts to natural plant communities

Avoidable
Significant Cumulative Impacts Which Can be Mitigated (City + County Buildout)

The significant impacts which may result from combined buildout of the updated City of Auburn General Plan within existing City limits with buildout of the unincorporated area per the County Plan but which can be avoided are listed below.

HYDROLOGY / WATER QUALITY

- Impacts of recommended water quality protection facilities
- Impacts of detention facilities

BIOTIC RESOURCES

- Impacts to natural plant communities

Unavoidable
Significant Impacts which Cannot be Mitigated (Plan Alone)

The impacts which may result from implementation of the Community Plan within the unincorporated area which will be significant and unmitigable are:

LAND USE

- Growth inducing impacts
- Affordable housing ratio (long-term)

Table 12
POTENTIAL JOBS/HOUSING RATE CITY + COUNTY AT BUILDOUT

Type	City Acres Provided	Jobs/Acre ¹	Total Jobs in City
Mixed Use ²	105 acres	x 25 =	2,625
Commercial	420	x 25 =	10,500
Industrial	430	x 17 =	7,310
City total jobs			20,435
County Total Jobs			37,914 ³
Area Total Jobs			58,349 jobs
			= 2.3 Jobs/housing/balance
			10,013 ⁴ dwelling units
			15,119 ³ dwelling units

¹SOURCE: Reicht Hausrath Study, January 1990
²Auburn/Bowman Community Plan Holding Capacity Spd Sit
³City of Auburn General Plan, Nov. 1990; p. IV-26, 50% Commercial assumed
⁴City of Auburn, General Plan, Nov. 1993; p. IV-26³See FEIR Table 10

Conclusion: Based on the impact evaluation criteria and the discussion above, impacts are expected to be less than significant.

Land Use Mix Balance

The following sections analyze the balance of land uses provided by the Community Plan.

IMPACT EVALUATION CRITERIA: *Environmental impacts can result from an inappropriate balance of land use types. For instance, a jobs housing imbalance can result in additional vehicle trips and related traffic and air quality impacts. As another example, an inability to provide adequate affordable housing sites could result in a labor force shortfall which could ultimately result in adverse fiscal impacts and an associated inability to provide adequate public facilities. Increased vehicle trips by out-of-area employees in commuting daily to jobs in the area could also result.*

Thus, the impact evaluation criteria are accepted land use mix standards including published standards as well as targets to meet county-wide needs which may be included in other County plans such as the overall General Plan and the County-wide Housing Element.

General Plans need to provide for a balance of land uses including housing, employment generating land uses, parks/open space, and public facilities. The adequacy of the Plan's housing mix is described in 4, below. Employment acreage provided is discussed in Impact 2, above. Agriculture and mineral resources are discussed in 4 and 5 of this section of the EIR. Parks/open space and public facility acreage is discussed in the Public Facilities section of this EIR.

4. Housing Land Use Mix Balance - The Plan The final Auburn/Bowman Community Plan creates the following residential use categories which can be combined in the following potential price ranges:

**Table 13
AUBURN/BOWMAN COMMUNITY PLAN
POTENTIAL NEW UNITS BY LAND USE PATTERN**

Land Use Pattern	Price Range	Potential Units	Percent of Total	Affordability Rental	Category ¹ Owner
Multi-family ²	\$ 70-125,000	435	5.7%	Very low income + above	Low income + above
Townhome/small lot, single family ³	\$100-180,000	3,459	45.6%	Low income & above	Upper end of low income + above
Single family ⁴	\$185-280,000	1,206	15.9%	n/a	Upper end of medium + above
Rural ⁵	\$210-400,000	2,462	32.9%	n/a	Above moderate
Total		7,592	100%		

¹ Based on current sales for newly constructed residential property in the Auburn/Bowman area, draft Placer County Housing Element, June 30, 1992, p. 59.

² HDR 60.9% of MU-Res

³ MDR, LMDR and 39.1% MU-Res

⁴ LDR and RLDR

⁵ RR, RE and AG.

SOURCE: Tbl 3, Recht Hausrath Study, January 1993

**Table 14
EXISTING AND POTENTIAL TOTAL UNITS (EXISTING & NEW) BY
LAND USE PATTERN**

Land Use Pattern	Total Units	% of Total	Affordability Rental	Category Owner
Multi-family ²	1925	12.7%	Very low income + above	Low income + above
Townhome/small lot single family ³	4496	29.7%	Low income + above	Upper end of low income + above
Single family ⁴	5347	35.4%	n/a	Upper end of med. + above
Rural ⁵	3352	22.2%	n/a	Above moderate
Total	15,119			

² HDR 60.9% MU-Res, Auburn Greens

³ MDR, LMDR, 39.1% MU-Res, MURes Martin and Edgewood

⁴ LDR, RLDR, Christian Valley, Saddleback, no. of Dry Creek/W of 49, Copper Penney & Bell, Luther Rd area, and Heidi & Sheridan Roads, Sullivan Ranch, North Park.

⁵ RR, RE and AG.

SOURCE: Auburn/Bowman Community Plan Holding

Capacity Spread Sheet

The Placer County Housing Element (June 30, 1992) projects the number of households by income group expected by 1997 as well as a target for new units needed by affordability category by 1997.

**Table 15
FAIR SHARE PROJECTION BY INCOME LEVEL
UNINCORPORATED PLACER COUNTY**

Total	Very Low	Other Low	Moderate	Above Moderate
1997 Household Projections	20%	17%	21%	41%
1990-1997 Target ² New Housing No.	24%	18%	22%	36%
1990-1997 Target ³ Auburn/Bowman Area New Housing Targets	316 (24%)	235 (18%)	293 (22%)	470 (36%)

¹Placer County Housing Element, June 1992, pp. 67.
²Based on Auburn/Bowman Community Plan

Based on the tables above, the Auburn/Bowman Plan does not have an adequate provision of new multi-family units (at 6.1%) to meet the unincorporated area County-wide projection of 20% total very low income households at ultimate buildout. Provision for approximately 1400 additional multi-family units would be needed. The Plan notes that small homes on small lots could fulfill part of this need as well as allowed density bonuses for rental, low income, and senior housing projects. Assuming that all new multi-family projects receive a 50% density bonus, a short-fall of multi-family designated land would still be seen. Additional very low income units may be provided as accessory apartments or second residential units; however, the number of these to be provided is very difficult to predict.

In addition, the Recht Hausrath market study (January 1993) concluded that because of the strong demand for larger lot single-family residential housing in the Plan area, there could be a tendency for developers to construct housing at a lower density than provided for on the Land Use map. This could further limit the supply of multi-family designated land. The Plan includes a minimum density allowed in the higher density residential categories to avert this trend.

Even for the life of the Plan (to 2010) only, the supply of multi-family land will be inadequate. The Community Plan projects a need for 865 new multi-family units by 2010 (ABCP Table 3) but only provides for 435 new multi-family units total (see EIR Table 13). The Recht Hausrath study (January 1993) notes that the Community Plan may actually provide an oversupply of multi-family housing. However, this conclusion relates to market conditions rather than the social goal of striving for a fair share balance of housing types not necessarily provided for by the market.

The other affordability categories are appropriately provided for. However, it should be noted that the County-wide Housing Element (June 30, 1992) notes that County-wide an appropriate supply of each residential land use type is available (which includes the Auburn/Bowman area).

Supply of appropriately designated land is not the only measure of ability to provide for affordable housing. The Community Plan as well as the County-wide Housing Element include policies which are intended to help facilitate the retention and new construction of affordable housing. This is particularly important since the market alone is not expected to provide the target level of low and very low income rental or for sale housing county-wide or in the Auburn/Bowman area (County-wide Housing Element, June 1992, p. 50; Reicht Hausrath Study, January 1993). In the short-term, these policies could assist in meeting affordability targets and overcoming market constraints, particularly those related specifically to supply. The Community Plan will also assist in implementing a number of supply-related county-wide Housing Element programs. The Community Plan's method of implementing key county-wide Housing Element policies is outlined in Table 16. Table 17 quantifies the Auburn/Bowman Area share of low and very low income affordable housing targets for various county-wide housing programs.

**Table 16
PLACER COUNTY HOUSING ELEMENT
SUPPLY RELATED POLICIES**

Supply Related Policies	How Implemented by A/B Community Plan
A.5 The county shall encourage "mixed-use" projects where housing is provided in conjunction with compatible non-residential uses.	Mixed Use designation in A/B Community Plan
A.12 All new housing projects of less than 100 units on land that has received an increase in allowable density through a general plan amendment, community plan amendment, rezoning or specific plan shall be required to pay an in-lieu fee of 1% of the total estimated land and construction cost of the project, for use in producing affordable housing.	This is a Countywide policy and is incorporated into Housing recommendation in the A/B Community Plan
A.13 Inclusionary housing provisions shall be incorporated in all new or updated community plans.	A/B Community Plan Housing Recommendation
Programs	
1. As part of the General Plan update, and as part of each community plan update, the	

Supply Related Policies	How Implemented by A/B Community Plan
county will review land use patterns, existing densities, the location of job centers and the availability of services to identify additional area that may be suitable for higher density residential development.	Completed in preparation of AB Community Plan
2. As part of the General Plan update, the county will develop a strategy for providing services and facilities for the areas designated for residential development.	Public Facility policies and programs
16. If redevelopment districts are adopted, the agencies shall utilize at least 20% of all tax increment proceeds for low income housing. In accordance with State law. Furthermore, a portion of all units built in the redevelopment area shall be affordable to very low, low and moderate income households, as required by State law.	AB Community Plan calls for a Redevelopment Area

Table 17
 PLAN POLICIES/PROGRAMS IMPLEMENTATION TARGETS
 LOW AND VERY LOW INCOME AFFORDABILITY

County-Wide Program Category ¹	County Target 1997	Auburn/Bowman Community Plan Estimate of Units by 1997 ²
Density bonus & other incentives	50	50
Second Units	0	25
Hardship mobile homes	50	10
Mobile homes on lots	35	5
Rental density bonuses	150	50
Group housing	15	5
Mixed-use housing	70	20
Inclusionary zoning	150	75
Housing authority	250	65
Nonprofit corporation	150	100
Redevelopment	200	100
Private market	6300	225
Auburn/Bowman Community Plan Program	400	
Small homes on small lots	NA	200
Accessory apartments		50
Land Banking	NA	0
Fee Waiver	NA	0

¹ Draft Placer County Housing element, June 1992, p. 22
² Estimated by Placer County Planning Dept.

Note: Overlap exists since units may be provided which fit more than one category.

If these programs are vigorously implemented, the short-term supply of very low and low income household affordable units should be adequate. It is reasonably assured that these measures will be implemented because specific target numbers, dates, and yearly progress monitoring are part of the County-wide Housing Element. In addition, the Community Plan will be reviewed for progress yearly.

However, in the long-term (after the Year 2002), an adequate multi-family housing land supply may not exist based on absorption rates in the Recht Hausrath study. The County did not choose to increase the supply of multi-family land because of negative traffic impacts which would result.

Conclusion:

Based on the impact evaluation criteria and the discussion above, short-term impacts are expected to be less than significant. Long-term impacts are considered significant and unmitigable without an increase in multi-family designated land.

5. **Housing Balance Land Use Mix - Cumulative City plus County buildout combined.** The City of Auburn is currently meeting its fair share allocation for very low and low income housing. As a result, the five year housing allocation plan in the City's Housing Element calls for only 8 units/yearly in the low income category and none in the very low income category. The City's Plan provides for a total of 240 acres of High Density Residential designation, 137 acres undeveloped. As a result, in the short-term, the City will be able to provide for its fair share of affordable housing.

Over the long-term, at buildout, the City's Plan (within existing City limits) provides for approximately 28% of all units in the multi-family category:

**Table 17a
EXISTING AND POTENTIAL UNITS - CITY OF AUBURN**

Land Use Pattern	Total Units	% of Total (10,378 ac)	Affordability Category	
			Rental	Ownership
Multiple Family Units ¹	2727 units	29.2%	Very low income + above	Low income + above
Townhome/Small Lot, Single Family ²	2420 units	24.2%	Low income + above	Upper end of low income + above
Fair Share Targets:				
Very Low Income			21%	
Low Income			17%	
			38%	

¹ 240 acres of HDR at 9 du/acre + 30% of MU area at 9 du/acre
² MDR, LMDR. The provision of multi-family, town home, and small lot single-family units is greater the fair share allocation for the City of 21% for the very-low income group and 17% for the low income group.

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Response to Comment Letter E

Placer Community Foundation

Veronica Blake

December 28, 2018

E-1 The comment expresses gratitude for the opportunity to comment, states that Placer County lacks workforce and affordable housing, and states that Placer Community Foundation hopes that the need to meet workforce and affordability requirements are taken seriously.

The need for affordable housing and the effects of the proposed project related to affordable housing are evaluated in Draft EIR Chapter 6, Population and Housing. The comment does not identify any inaccuracies or inadequacies in the Draft EIR. No response is required.

E-2 The comment states that Table 3-2 should be amended to include the use of all the buildings that were demolished, and references the 2002 North Fork Associates Existing Conditions Report as a source for that information.

CEQA requires that the environmental effects of a proposed project be evaluated in relation to the existing conditions at the time that the environmental review begins. The existing conditions from which the project's impacts are evaluated is referred to as the baseline condition. The activities and land uses that may have occurred at the project site in the past are not part of the baseline condition. Thus, the specific uses of previously demolished buildings is not relevant to the impact analysis or conclusions in the Draft EIR. Information regarding previously demolished buildings was included in the Project Description to provide context regarding past disturbance within the project site, the processes followed by Placer County related to past CEQA compliance regarding changes to potential historic resources, and the degree of changes that have occurred within the original DeWitt General Hospital campus. However, for informational purposes, brief descriptions of general building usage prior to demolition have been added to Table 3-2.

E-3 The comment states that the Draft EIR should acknowledge the 1994 Auburn/Bowman Community Plan EIR's finding of a significant impact associated with affordable housing due to the limited amount of multifamily zoned property in the plan area. The comment states that the impact may be greater now than it was at the time the Auburn/Bowman Community Plan was adopted because land that had been zoned for multifamily residential uses has been developed as single-family housing. The comment concludes that the Placer County Government Center (PCGC) property may be the only viable option to provide affordable housing.

The Draft EIR evaluates cumulative impacts related to affordable housing in Impact 6-4. On page 6-21, the Draft EIR finds that the cumulative impact would be significant, stating, “The increase in low-wage jobs in the cumulative scenario would increase the demand for affordable housing in the Auburn/Bowman community. This would be a significant cumulative impact.” Although this determination does not specifically rely on the conclusion reached in the Auburn/Bowman Community Plan EIR, it is consistent with the analysis in that prior document. It also reflects consideration of data and analysis presented in Placer County’s 2013 Housing Element and associated Background Report. These documents provide a recent inventory of housing stock and available land for development of affordable housing, and therefore provides more current data and analysis of affordable housing supply, demand, and opportunities than the Auburn/Bowman Community Plan and associated EIR. Table A-2 of the Placer County Housing Element Background Report identifies several other locations in Placer County where additional affordable housing development may occur; thus, the PCGC property is not the only viable option for affordable housing.

E-4 The comment identifies disagreement with the conclusion that Impact 6-4 is less than significant because the Auburn/Bowman Community Plan found the affordable housing ratio to be a significant and unavoidable impact.

As discussed in Response to Comment E-3, the PCGC Master Plan Update Draft EIR recognizes that there would be a significant cumulative impact associated with demand for affordable housing. Further, as explained in the following paragraphs, the Draft EIR also demonstrates that the proposed PCGC Master Plan Update would not make a cumulatively considerable contribution to that impact.

The Draft EIR erroneously stated that the Placer County Housing Element does not assume any affordable housing would be developed within the PCGC property. Table A-2 of the Placer County Housing Element Background Report reports on the vacant lands within Placer County that have land use and zoning designations that would allow for multifamily residential development. Table A-2 identifies a maximum potential of five units for moderate-income households within one of the parcels that comprise the PCGC property. Text on pages 6-21 and 6-22 of the Draft EIR has been revised to include this information. Four other parcels within the PCGC property are included in the Placer County Housing Element vacant lands inventory as having the potential to support affordable housing development but the Housing Element does not assume any units would be constructed on those parcels.

Further, the Placer County Housing Element Background Report notes in the table presenting an evaluation of the 2008 Housing Element policies that the PCGC property “may be suitable for affordable housing. A proposed master plan for the DeWitt

complex is an opportunity to designate parcels for high-density affordable housing.” In response to this evaluation, the Placer County Housing Element includes Program A-7, which states, “The County shall update the DeWitt Center Master Plan to identify sites that are appropriate for higher-density and mixed-use development.” The proposed PCGC Master Plan Update implements this program by allowing multifamily residential development with a maximum density of 30 dwelling units per acre within the proposed 24-acre Multifamily Residential Thematic Area (of which approximately 4 acres are already developed, leaving a total of 20 acres available for new development) and 17-acre Mixed-Use Thematic Area. The Multifamily Residential Project evaluated in the Draft EIR would be located on a 3-acre site within the Multifamily Residential Thematic Area. This site would support affordable housing. These thematic areas are described in the Draft EIR on page 3-16 and the Multifamily Residential Project is described in Draft EIR on page 3-26. In that description, the Draft EIR states that current plans for the Multifamily Residential Project include 79 dwelling units. The proposed PCGC Master Plan Update would provide more affordable housing units at the project site than were accounted for in the Placer County Housing Element projections.

The Draft EIR concludes that the project’s contribution to the cumulative affordable housing impact would be less than significant because a portion of the regional affordable housing demand would be met on site, the project would construct more affordable housing units than were anticipated for the site, and the project would not impair Placer County’s ability to implement its Housing Element or meet its Regional Housing Needs Allocation targets.

E-5 The commenter states that priority should be given to development of 400 affordable housing units over other non-governmental development within the PCGC property, and no other non-governmental development should occur until the affordable units are completed.

The proposed PCGC Master Plan Update allows multifamily residential development within the Multifamily Residential Thematic Area and the Mixed-Use Thematic District, with a maximum allowable density of 30 dwelling units per acre. As stated on Draft EIR page 3-16, development projections for the PCGC property reflect the detailed assessment of the existing and future space needs for each Placer County department located at the site, and a local market analysis that considered the potential for the site to support private commercial and residential uses. The development scenario on which the Draft EIR analysis is based anticipates 485 multifamily dwelling units within the PCGC property. The Multifamily Residential Project is proposed as an affordable housing development of 79 units. This is 16% of the total dwelling units anticipated for the site, which exceeds Placer County’s goal identified in its Housing

Responses to Comments

Element Policy B-14 to “consider requiring 10 percent affordable units, payment of an in-lieu fee, or comparable affordable housing measure(s) acceptable to the County, for any General Plan amendment that increases residential density.”

The Draft EIR concludes that the proposed PCGC Master Plan Update would have a less-than-significant impact associated with impairing Placer County’s ability to meet Regional Housing Needs Allocation targets or increasing demand for affordable housing (Impact 6-2). As discussed in Response to Comment E-4, the Draft EIR also concludes that the proposed PCGC Master Plan Update would have a less-than-significant contribution to cumulative impacts associated with affordable housing (Impact 6-4). Thus, the project would not result in a significant adverse environmental effect that could be reduced by increasing the amount of affordable housing provided on site.

E-6 The comment states that Placer County should explain why it’s not complying with the Surplus Land Act, and provides a brief summary of the Surplus Land Act.

Consideration of how the Surplus Land Act may apply to the proposed PCGC Master Plan Update and individual projects undertaken in implementation of the Master Plan Update does not address the project’s potential to result in physical environmental effects, and thus is not relevant to the analysis required under the California Environmental Quality Act. The County will consider whether the Surplus Land Act is applicable to individual projects undertaken in implementation of the proposed Master Plan Update at the time that each project is proposed. This consideration will reflect the nature and specific terms of potential future land-related transactions, if any, including considering the applicability of AB 1943 (Chappie 1978) to such transactions.

E-7 The comment states that the Placer Community Foundation is pleased that Placer County is replacing the affordable housing units that were provided in the Bell Gardens apartments that were previously located on site, but that 79 units are not enough. The comment references comments made in 2016 requesting that at least 20% (20 acres) of the site be designated for residential uses, which would allow 400 units at a density of 20 units per acre.

As discussed in Response to Comment E-4, the proposed PCGC Master Plan Update would accommodate development of more affordable housing units than the Placer County Housing Element estimated would be placed within the site. Further, the proposed project would increase the allowable residential density from the current 15 dwelling units per acre to 30 units per acre. This provides the potential for additional affordable housing, and for workforce housing to be developed in the Multifamily Residential Thematic Area and the Mixed Use Thematic Area. As shown in Response to Comment E-4, these areas would provide a total of 38 acres where multifamily residential land uses would be permitted.

Responses to Comments

E-8 The comment states that “multifamily” does not mean “affordable,” and that the number of affordable units should be clarified. The comment also questions who will own and manage the rental units.

As stated in the Draft EIR on page 3-26, “The Multifamily Residential project located at 1st Street and B Avenue is currently proposed to include 79 dwelling units, although this EIR evaluates a maximum development of up to 100 dwelling units at this location.” There is no commitment for any of the other residential units constructed within the PCGC property to include affordable housing. Ownership and management of the rental units is an important consideration for Placer County’s housing program, but does not relate to the physical environmental effects of the proposed project. Thus, these details are not necessary to include in the EIR.

E-9 The comment recommends two mitigation measures regarding the capacity of sewer and water infrastructure: where capacity is limited, affordable housing should receive priority over other non-governmental uses, and funding sources for off-site infrastructure serving affordable housing should be identified and reserved so that affordable housing projects are not delayed or burdened by the costs for construction or infrastructure improvements.

The suggested mitigation measures address financial aspects of affordable housing development. There are no significant adverse environmental effects that these measures would reduce or offset thus the suggestions are not appropriate mitigation measures to include in the EIR. The Placer County General Plan Housing Element includes several policies and programs related to providing financial incentives and assistance for the development of affordable housing that the County will continue to implement.

E-10 The comment questions whether or not the 141 new Health and Human Services employees were included in the overall governmental jobs increase of 450 employees. The comment also questions how many jobs the hotel will generate.

Draft EIR page 3-25 states that there are 435 existing Health and Human Services employees, and this is projected to increase to 577 by 2035. This reflects an increase of 142 jobs. Text on page 18-23 stating there would be potentially 141 new Health and Human Services employees has been corrected.

Text on page 6-17 reports that Placer County employment projections were derived from the facility needs assessment conducted as part of the proposed PCGC Master Plan Update, which documents the existing and projected employment levels for each Placer County division and department. The employment projections indicate that the PCGC campus could reach 2,102 County employees at full build-out (2037), which is an increase of 410

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employees compared to current staffing levels. This is inclusive of all departments housed at the PCGC property, including the 142 new Health and Human Services employees.

The same page of the Draft EIR provides a range of estimated new non-governmental employment based on the total square footage of commercial and office space. This includes the hotel. A separate estimate of employment specific to the hotel was not developed because the Draft EIR provides a programmatic analysis of the overall PCGC Master Plan Update.

Responses to Comments

Comment Letter F

From: Ramona Brockman <ramona.brockman@gmail.com>
Sent: Wednesday, January 02, 2019 10:54 AM
To: Placer County Environmental Coordination Services
Subject: Attn: Shirlee Herrington Re: PCGC Master Plan Update DEIR Comments

To: Shirlee Herrington
Environmental Coordination Services, Placer County Community Development Resources Agency

From: Ramona Brockman, 4060 Ridge Drive, Loomis, CA

Re: Public Comment for the PCGC Master Plan Update (PLN18-00195) Draft EIR

Thank you for the opportunity to comment on the PCGC Master Plan Update Draft EIR (DEIR). I would like to submit the following comments and concerns regarding this DEIR. While my comments are organized in numeric order of chapter, some comments made in a particular chapter can and are referenced to apply to other chapters throughout the DEIR as much of the information presented in the DEIR is repetitive. Considering the extensive list of my comments and concerns for this DEIR, in addition to any comments submitted by other individuals and agencies, I would like to be advised on the CEQA regulations requiring the recirculation of a DEIR. If a significant number of comments are received or substantial issues are commented on, would changes to the project and DEIR need to be made and recirculated for comment?

F-1

Chapter 1 – Summary of Project Impacts comments and concerns:

Impact: Would the project substantially contribute to cumulative land use impacts, including dividing existing communities, creating land use incompatibilities, or creating conflicts with adopted planning documents?
Level of Significance: No significant cumulative impact for MPU & HHS

I disagree that there is no significant impact. The proposed project does conflict with the goals and policies of the Placer County General Plan and the Auburn/Bowman Community Plan in terms of treatment of historic resources and buildings. The PCGC Master Plan Update specifies the demolition of 35 of the 50 historic DeWitt General Hospital buildings. How can demolition of over half of the buildings in this historic district not conflict with the General Plan and Auburn/Bowman Community Plan?

F-2

The Placer County General Plan Goal 5.D and its related policies indicate that the county should "identify, protect, and enhance Placer County's important historical, archaeological, paleontological, and cultural sites and their contributing environment." The Placer County General Plan also indicates in Policy 1.0.6 and 1.0.7 that "Historically or architecturally significant buildings should be preserved and not be substantially changed in exterior appearance in ways that diminish their historical character, unless doing so is necessary to avoid or mitigate hazards, and other means of mitigation are infeasible. Such structures should be preserved and used as focal points of community design" and "The County shall require that mixed-use areas include community focal points to serve as gathering and/or destination points." Given these policies, why does the proposed project identify the historic DeWitt Hospital theater and auditorium for demolition rather than their preservation as focal points?

Similarly, the Auburn/Bowman Community Plan goals indicate to: "PRESERVE AND ENHANCE SIGNIFICANT HISTORICAL, CULTURAL, AND/OR ARCHAEOLOGIC SITES AND THE SURROUNDING ENVIRONMENT" and "ENCOURAGE THE CONTINUED PROVISION OF A WIDE VARIETY OF CULTURAL ACTIVITIES THAT CONTRIBUTE TO THE APPEAL OF THE AUBURN AREA." With related relevant policies stating:

- a. Identify and protect from destruction and abuse all representative and unique historical, cultural, and archaeological sites and their immediate environment.
- b. Encourage and promote existing and proposed legislation for the protection of notable pre-historic and historic sites, artifacts, and visual site impact and flora.
- c. Encourage the development of multipurpose facilities which can function as recreational sites, open space areas and for historic, cultural, and archaeological preservation.
- d. Require site specific studies for archaeological or historical sites within the federal government's definition of "historical context" in all instances where land development has the potential to have a detrimental impact on these sites.

F-3

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e. Protection of significant cultural resource is a priority over recordation and/or destruction.

It is very important to note that the DEIR analysis of land use compatibility and the analysis of conformity or conflict with the Auburn/Bowman Community Plan should take into account that the Auburn/Bowman Community Plan was written well before the DeWitt hospital structures were determined to be an historic resource. The Auburn/Bowman Community Plan was written in 1994 with an update in 1999, but the DeWitt hospital buildings were not identified as an historic resource until 2003 in the DeWitt Government Center Facility Plan EIR. Thus, the sections of the Auburn/Bowman Community Plan that refer to the land use of the DeWitt Center and treatment of DeWitt hospital structures should be interpreted and/or updated to take the historic determination of the DeWitt hospital buildings into account.

F-3
Cont.

Again I question, how the proposed project's plan to demolish 35 historic buildings does not conflict with the adopted policies of the Placer County General Plan and the Auburn/Bowman Community Plan?

F-4

"Impact: Would the project cause a substantial adverse change in the significance of a historical resource?
Level of Significance: MPU: Significant; HHS: Significant Mitigation Measure(s): Mitigation Measure 8a: At the time that building maintenance and repair needs are identified for any building within the project site that is identified as a contributing feature to the DeWitt General Hospital Historic District, the County of Placer shall implement all applicable and feasible provisions of the Secretary of the Interior's Standards for Rehabilitation, codified as 36 Code of Federal Regulations Part 67, and shall review and implement any appropriate Guidelines for Rehabilitating Historic Buildings and Guidelines on Sustainability for Rehabilitating Historic Buildings.
HHS: No feasible mitigation available"

F-5

Why is the utilization of Historic Building Codes for rehabilitation not noted in mitigation measure 8a?

Why are there no feasible mitigation measures available for the HHS project? Alternative 3 shows a different location for the HHS building to avoid demolition of historic structures. However, there is no analysis or discussion of Alternative 3 in the DEIR that states why this alternative was not selected as the preferred plan. The DEIR is supposed to explain why the proposed project was selected over other alternatives. At the very least, one possible mitigation measure would be to require that the County shall encourage and consider adaptive reuse projects for all historic DeWitt General Hospital buildings as a priority over demolition. This mitigation measure would be a mitigation measure supporting the Master Plan Update guiding principle of adaptive reuse.

"Impact: Would the project contribute to substantial adverse changes in historical, archeological, or tribal resources in the cumulative scenario?
Level of Significance: MPU: Significant; HHS: Significant Mitigation Measure(s): MPU: No feasible mitigation available; HHS: No Feasible mitigation available"

In consideration of the phasing and long time period of the projected 20-year project build out, I question that there is no feasible mitigation measures for the historic buildings identified for demolition. As is pointed out in the DEIR, circumstances surrounding anticipated development can, and are likely to change over a 20-year time frame. It would stand to reason then, that the demolition of historic buildings can and should be avoidable until new project(s) are approved. Thus, reasonable mitigation measures for the historic DeWitt Hospital buildings would be to prevent the physical deterioration and premature demolition of these buildings. For instance, such mitigation measures should include mandatory routine maintenance and repair of all historic DeWitt buildings and the prevention of historic building demolition prior to 60 days of the start of construction for an approved project. Occupancy and use of all vacant historic DeWitt buildings would also be a feasible mitigation measure considering the 20-year build out time frame.

F-6

It is also important to note that the 2003 DeWitt Government Center Facility Plan EIR was quite specific about the time frame of when historic buildings would be removed. It would seem equally important to require such specifics for building demolition in the Master Plan Update EIR.

F-7

Chapter 2 – Introduction comments and concerns:

Page 2-3 states that the PCGC Master Plan Update EIR is to be a program level and a project level EIR for two specific projects, a Health and Human Services Building and a Multifamily Residential project. While the Health and Human Services Building and the Multifamily Residential projects are discussed throughout the DEIR, very little detailed information and analysis is provided for these projects. The project descriptions for these buildings are vague and only grading plans are provided. I would think that a project level EIR would require more specific site plan detail and evaluation, consideration of site location and alternatives, parking and circulation analysis, renderings of site plans and

F-8

Responses to Comments

building elevations, etc. Is the information and analysis presented in this DEIR sufficient at the project level for these two projects?

F-8
Cont.

Chapter 3 - Project Description comments and concerns:

Page 3-7 States that "the State Historic Preservation Office issued a determination that the PCGC campus did not qualify as a historic district or support any historic buildings (Mikesell 2004). The County relied on this determination to demolish additional structures (beyond those identified for removal in the 2003 Facility Plan EIR), with no need for further environmental analysis." These statements are problematic and misleading. These statements refer to a letter written in 2004 by the acting State Historic Preservation Officer to the Army Corps of Engineers as part of a Section 106 review for the purposes of the County obtaining a Section 404 Clean Water Act Permit. The use of this letter to justify the demolition of additional DeWitt Hospital buildings beyond those identified in the 2003 EIR was an over reach in County authority that did not comply with CEQA. According to the State Historic Preservation Office, the criteria for determining if a property is a historical resource for purposes of CEQA are more broad and different than the criteria for listing in the National Register. Thus, the County's use of the 2004 letter justifying environmental clearance for demolition was in error as this letter was not sufficient to determine if the buildings were historic resources for the purposes of CEQA.

F-9

Page 3-8 States that the PCGC Master Plan Update proposes to demolish portions of the DeWitt Historic district, but does not provide any detail on how much demolition. The amount of demolition is 35 of the 50 historic DeWitt Hospital district structures, which is found in chapter 8. Detailed information on the magnitude of the proposed demolition should be included in this section as the demolition is a significant impact to a historic resource that is listed in the National Register of Historic Places.

F-10

Page 3-12, as well as other sections of the DEIR, states that adaptive reuse is one of the guiding principles of the PCGC Master Plan Update.

However, the Master Plan Update calls for the demolition of 35 of the 50 historic DeWitt Hospital district structures. This massive amount of demolition does not seem to support this guiding principle very well.

F-11

Furthermore, many of the DeWitt Hospital buildings slated for demolition are located in areas identified in the Master Plan Update on land to be used for private development. How can the County justify demolition of historic structures owned by the County on government land that is earmarked for private development when accommodating this private development will result in such a large significant and unavoidable impact, especially with an anticipated build out of 20 years? Recommending demolition of these buildings seems premature.

F-12

Considering the 20-year build out timeframe, what is the timeframe for the proposed demolition? What are the County's plans for the treatment of the historic DeWitt Hospital buildings identified for demolition? Similar to the 2003 EIR the Master Plan Update DEIR should include specific information on timing and phasing of the project, including the treatment of historic resources and any proposed demolition. As noted earlier in Chapter 1 comments, premature removal of historic structures should be included as a mitigation measure and specifically addressed in the project's timing and phasing.

F-13

Page 3-15 References that the PCGC Master Plan Update proposes to change the land use designation and zoning. The proposed land use designation for the entire 200 acre site would be changed to Placer County Government Center Master Plan. No rationale for this land use change is provided. What is the rationale for the land use designation change for the entire site, especially for the areas of the site that are identified for non-governmental uses? Why are the land use designations identified in the Auburn/Bowman Community Plan no longer sufficient to justify the proposed change? No additional information regarding this land use designation change is found in Chapter 5.

F-14

Chapter 5 - Land Use and Planning comments and concerns are as follows:

Page 5-1 States that the Surplus Land Act is not applicable to this project and no discussion or explanation is provided despite that discussion of compliance with this Act was requested in Notice of Preparation comments.

F-15

On pages 5-8 to 5-10 there is a listing of Placer County General Plan Goals and Policies. However, Goal 5D and its related policies intended "To identify, protect, and enhance Placer County's important historical, archaeological, paleontological, and cultural sites and their contributing environment." is not listed. Goal 5D and its related policies are, however, listed in Chapter 8. Similarly, the goals and policies of the Auburn/Bowman Community Plan pertaining to historic resources are also absent from this section, but are listed in Chapter 8. Why are these pertinent General Plan and Auburn/Bowman Plan policies not listed or addressed in this section?

F-16

Responses to Comments

Furthermore, relevant Placer County General Plan policies were not listed in either Chapter 5 or Chapter 8. Why were the following 4 General Plan policies not listed as pertinent policies in the DEIR?

Policy 1.0.6 Historically or architecturally significant buildings should be preserved and not be substantially changed in exterior appearance in ways that diminish their historical character, unless doing so is necessary to avoid or mitigate hazards, and other means of mitigation are infeasible. Such structures should be preserved and used as focal points of community design.

Policy 1.0.7 The County shall require that mixed-use areas include community focal points to serve as gathering and/or destination points. Examples of focal points include civic centers, parks, fountains, monuments, and street vistas. On-site natural features, such as wetlands and streams, can also function as focal points.

Policy 5.D.2 The County shall solicit the cooperation of the owners of cultural and paleontological resources, encourage those owners to treat these resources as assets rather than liabilities, and encourage the support of the general public for the preservation and enhancement of these resources.

Policy 5.D.9 The County shall use the State Historic Building Code to encourage the preservation of historic structures.

The proposed project's recommended demolition of 35 of the 50 historic DeWitt General Hospital buildings does not seem to be in compliance with the any of the policies in the Placer County General Plan and Auburn/Bowman Community Plan that pertain to the treatment of historic resources. Thus I question the determination in the DEIR that there is no impact in terms of land use as the proposed project conflicts with applicable land use plans and policies with jurisdiction over the project.

Furthermore, it is very important to note that the DEIR analysis of land use compatibility and the analysis of conformity or conflict with the Auburn/Bowman Community Plan should take into account that the Auburn/Bowman Community Plan was written well before the DeWitt hospital structures were determined to be an historic resource. The Auburn/Bowman Community Plan was written in 1994 with an update in 1999, but the DeWitt hospital buildings were not identified as an historic resource until 2003 in the DeWitt Government Center Facility Plan EIR. Thus, the sections of the Auburn/Bowman Community Plan that refer to the land use of the DeWitt Center and treatment of DeWitt hospital structures should be interpreted and/or updated to take the historic determination of the DeWitt hospital buildings into account.

For example, on page 5-24 to 5-25, the DEIR dismisses both General Plan and Auburn/Bowman Community Plan policies calling for the preservation of historic resources because the Auburn/Bowman Plan notes the replacement of DeWitt "barrack" style buildings. However, this literal analysis does not take into account that the DeWitt hospital buildings were not yet known to be historic when the Auburn/Bowman Plan was written.

Chapter 8 - Cultural Resources comments and concerns are as follows:

On Page 8-6 and throughout the DEIR, the DeWitt General Hospital buildings are incorrectly referred to as "semi-permanent". The National Register nomination references a primary source from the War Department identifying DeWitt General Hospital as having only permanent buildings.

Page 8-9 The historical summary of the DeWitt Hospital as a state mental hospital is lacking detail. The National Register nomination for the DeWitt General Hospital details the importance of the hospital and its relation to Tarmo Pasto and Martin Ramirez. This additional historical information should be added as the DeWitt Hospital is listed on the National Register for both its significance as a WWII hospital and during its years as a state mental hospital.

Page 8-11 This section again references the problematic use of the 2004 State Historic Preservation Officer letter as environmental clearance for the demolition of historic DeWitt Hospital buildings.

As noted by earlier, the use of this letter for environmental clearance was non-compliant with CEQA. See my previous comments for Page 3-7.

Page 8-12 incorrectly states that about half of the brick hospital structures remain. The National Register nomination clearly states that approximately 60% of the DeWitt Hospital structures remain.

The statements on this page related to the listing of the DeWitt General Hospital on the National Register are also not completely accurate. While it is correctly noted that the DeWitt Hospital is likely one of the most intact remaining examples of a Type A general hospital, this is not the sole reason for its listing on the National Register of Historic Places.

F-17

F-18

F-19

F-20

F-21

F-22

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<p>under Criteria A. The National Register nomination indicates that the DeWitt Hospital is significant under Criteria A in the area of health/medicine during its use as an Army General Hospital and as a state mental hospital. During WWII, Dr. Norman Freeman pioneered vascular surgical techniques while stationed at DeWitt General Hospital. In addition, DeWitt Hospital is significant for its association with Tarmo Pasto, a notable early pioneer in the study of artistic expression and psychology theory whose research was important to the establishment of art therapy as a treatment for mental illness. Additionally, the operation of the DeWitt Hospital was locally significant as its construction and operation as a World War II Army general hospital and later as a state mental hospital constituted the Auburn area's driving economic force and the community's largest employer from the period 1943 to 1972. Furthermore, the correct periods of significance for DeWitt Hospital under Criteria A are 1943-1945 and 1946-1963.</p>	↑ F-22 Cont.
<p>Page 8-25 states that the PCGC Master Plan Update would retain 15 of the DeWitt Hospital structures, with all other structures to be demolished. While it is noted that Notice of Preparation comments requested other key hospital structures, such as the theater, adjoining patient wards, auditorium and gym be retained, no discussion or rationale is provided in the DEIR for why these structures cannot be retained and adaptively reused.</p>	F-23
<p>In addition, Notice of Preparation comments also noted the need for compliance with local regulations, but no discussion was provided in this chapter regarding the project's compliance with the Auburn/Bowman Plan and Placer County General Plan in regards to these plans' goals and policies for retaining historic structures.</p>	F-24
<p>Page 8-33 States that 35 of the 50 historic DeWitt structures are identified for demolition with an impact that would be significant and unavoidable. It is also stated that HABS standard photographic documentation as a mitigation measure has already been completed. However, since then, the DeWitt swimming pool has been filled in. How will the loss of this historic DeWitt Hospital structure be mitigated?</p>	F-25
<p>Furthermore, it is important to point out that while HABS standard documentation was a mitigation measure required in the 2003 DeWitt Government Center Facility Plan EIR, this should not necessarily be the default "already completed" mitigation measure for the Master Plan Update EIR. HABS standard documentation is considered a last resort mitigation measure, and would be unacceptable according to the Auburn/Bowman Community Plan policy that states protection of historic resources is a priority over recordation and/or destruction.</p>	F-26
<p>Chapter 20 – Alternatives comments and concerns are as follows:</p>	
<p>Page 20-4 indicates that the DeWitt Hospital theater and the adjoining patient ward buildings, referred to as the "300s ramp" retain a greater degree of original construction. What is the justification for the proposed demolition of these buildings as they are key iconic buildings associated with the historic DeWitt General Hospital and Type A hospital design? Furthermore, this page provides deceptive information stating that the majority of these buildings have been vacant for many years. County records indicate that many of these buildings were occupied by tenants through 2014-2015 and were only vacated because the County did not want to renew leases for these buildings in anticipation of a Costco store being constructed on the site. Existing building conditions of these buildings are rated as fair and can be found on pp. 27-30 of the Draft PCGC Master Plan Update and detailed building facilities assessments are found in Appendix A which shows that most of the historic DeWitt hospital buildings, including vacant buildings, rate as having foundations and roofs in good condition and URM walls in fair condition. Considering that the DeWitt Hospital buildings qualify for California Historic Building Codes, do the existing building evaluations found in the Draft PCGC Master Plan Update provide an accurate assessment of the DeWitt Hospital buildings? In 2014 the theater tenants had an independent inspection of the building concluding that the theater was structurally sound.</p>	F-27
<p>Additionally, it is noted on this page, and in other sections of the DEIR, that the DeWitt Hospital buildings would need extensive improvements to meet California Building Code requirements, in accordance with the Secretary of the Interior Standards for Historic Buildings. This language is confusing. The historic DeWitt Hospital buildings qualify for compliance with special California Historic Building Codes as opposed to using current building code requirements.</p>	F-28
<p>Furthermore, on this page and throughout the DEIR, the DeWitt Hospital buildings are incorrectly referred to as semi-permanent construction.</p>	
<p>The National Register nomination references a primary source from the War Department identifying DeWitt General Hospital a permanent facility.</p>	F-29
<p>Summary of Alternatives comments and concerns include:</p>	
<p>The DEIR notes that Alternative 2 lessens the significant impact of demolishing historic DeWitt Hospital buildings by retaining the "300s ramp" theater and its adjoining patient wards. Interestingly, this alternative also adds the construction</p>	↓ F-30

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of over 200 additional apartment units. These additional apartment units are given as the reason that Alternative 2 is rejected as viable. Concern over housing supply is stated as the rationale for the additional 200 apartment units. However, housing supply is not identified as a significant impact. Can the number of additional units be lessened to make this alternative feasible?

↑
F-30
Cont.

The DEIR also states that Alternative 3 would lessen the significant impact of demolishing historic DeWitt Hospital buildings. This alternative also lessens the impact of air quality and greenhouse gases, but yet this alternative was not selected as the preferred plan. However, the DEIR does not describe why Alternative 3 was not selected as the preferred plan. According to the comparison table on p. 20-35, Alternative 3 clearly would cause the least negative impacts.

↑
F-31

Furthermore, Alternative 3 shows the addition of two parking structures. Why are these parking structures needed if the total building space is 44,915 square feet less than the proposed project and the proposed project does not include parking structures?

↑
F-32

Finally, why is Alternative 3 referred to as "increased non-residential intensity" when the total building square footage of 775,162 sf is less than the 820,077 sf of the proposed project?

↑
F-33

Thank you for your attention to these concerns and questions.

Sincerely,
Ramona Brockman

Response to Comment Letter F

Ramona Brockman

January 2, 2019

F-1 The comment expresses gratitude for the opportunity to comment, and outlines the structure of the comment letter. The comment also requests clarification on the California Environmental Quality Act (CEQA) requirements regarding Draft Environmental Impact Report (EIR) recirculation.

CEQA Guidelines Section 15088.5 directs that a Draft EIR must be recirculated if “significant new information” is added. Significant new information is information that changes the EIR “in a way that deprives the public of meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative that is considerably different than those previously analyzed) that the project’s proponents have declined to implement.” CEQA Guidelines Section 15088.5a provides examples of what constitutes significant new information, and Section 15088.5b states, “recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.” None of the responses to comments or text revisions made to the Draft EIR constitute significant new information, thus recirculation is not required.

F-2 The comment expresses disagreement with the conclusion in Draft EIR Chapter 1 that the Placer County Government Center (PCGC) Master Plan Update and the Health and Human Services building would have no significant land use impacts. The comment states that both would conflict with the goals and policies of the Placer County General Plan and the Auburn/Bowman Community Plan in terms of treatment of historic resources and buildings, specifically General Plan Goal 5D and Policies 1.O.6 and 1.O.7.

The comment is correct that the Placer County General Plan policies indicate preference for retaining historic buildings and using them as focal points in community design. However, the policies do not mandate that all historic buildings must be retained. They state that the County of Placer (County) should protect historic resources and preserve historic structures. Use of the word “should” is generally understood to be a recommendation but not prescriptive.

In considering whether a project would result in adverse impacts related to land use and planning, CEQA requires a lead agency to consider whether the project is inconsistent with the provisions of the general plan that relate to avoiding or mitigating environmental effects based on the analysis of a project’s environmental effects. The role of the lead agency’s decision-making bodies with regard to interpretation of a

general plan in relation to determining if a project is consistent with that plan has been the subject of litigation, and the decisions of the courts provide guidance in this regard, as follows:

- “A general plan must try to accommodate a wide range of competing interests—including those of developers, neighboring homeowners, prospective homebuyers, environmentalists, current and prospective business owners, jobseekers, taxpayers, and providers and recipients of all types of city-provided services—and to present a clear and comprehensive set of principles to guide development decisions. Once a general plan is in place, it is the province of elected city officials to examine the specifics of a proposed project to determine whether it would be ‘in harmony’ with the policies stated in the plan” (*Sequoyah Hills Homeowners Assn. v. City of Oakland* [1993] 23 Cal.App.4th 704, 719-720 [*Sequoyah Hills*]).
- “An action, program, or project is consistent with the general plan if, considering all of its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment. State law does not require perfect conformity between a proposed project and the applicable general plan” (*Friends of Lagoon Valley v. City of Vacaville* [2007] 154 Cal.App.4th 807, 817, internal quotations and citations omitted).
- “In other words, ‘it is nearly, if not absolutely, impossible for a project to be found in perfect conformity with each and every policy set forth in the applicable plan.’” (*Pfeiffer v. City of Sunnyvale City Council* [2011] 200 Cal.App.4th 1552, 1563, quoting *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1511).

Thus, under CEQA, the consideration of general plan consistency may take into account the degree to which policies relate to avoiding or mitigating environmental effects and a balancing of the competing interests represented by the plan as a whole.

Placer County General Plan Policies 1.O.6 and 1.O.7 are found in the Land Use Element under the subheading “Development Form and Design” under “Goal 1.O: To promote and enhance the quality and aesthetics of development in Placer County.” Thus, the policies may be understood to primarily address issues of aesthetics and community character. Policy 1.O.7 provides additional direction regarding focal points, stating “Examples of focal points include civic centers, parks, fountains, monuments, and street vistas. On-site natural features, such as wetlands and streams, can also function as focal points.” The proposed PCGC Master Plan Update would create a central focal point with its Community/Events Center and Community Green in the Community Thematic Area (refer to Draft EIR Figures 3-7 and 3-8). The

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project would also retain the chapel and four of the patient ward buildings adjacent to the Community Thematic Area, extending the central focal point to the northeast. Further, the proposed project includes Development Standards and Design Guidelines to ensure that a high level of design that reflects key design elements of existing buildings within the project site is attained with each individual project undertaken during implementation of the Master Plan Update. The project is considered consistent with the Placer County General Plan goals and policies related to aesthetics and community character because it would create a central focal point, would establish regulations and guidelines that control development quality and aesthetics, and would create a mixed-use community with a consistent design theme and character that is compatible with existing buildings at the site.

Additional guidance regarding the County's preference to prioritize protection of historic resources is found in the Placer County General Plan Recreation and Cultural Resources Element, including Goal 5.D and Policies 5.D.6, 5.D.7, and 5.D.9. Policy 5.D.7 specifically recognizes that not all cultural resources (including historic resources) can be protected. It states, "The County shall require that discretionary development projects are designed to avoid potential impacts to significant paleontological or cultural resources whenever possible. Unavoidable impacts, whenever possible, shall be reduced to a less than significant level and/or shall be mitigated by extracting maximum recoverable data. Determinations of impacts, significance, and mitigation shall be made by qualified archaeological (in consultation with recognized local Native American groups), historical, or paleontological consultants, depending on the type of resource in question." The proposed demolition of buildings within the DeWitt General Hospital Historic District is not in conflict with the Placer County General Plan.

Finally, the determination that the proposed project is in harmony with the referenced Placer County General Plan policies is consistent with the County's prior interpretation of its General Plan. Policies 1.O.6, 1.O.7, 5.D.6, 5.D.7, and 5.D.9 were included in the General Plan at the time that the prior master plan for the PCGC property was adopted, in largely the same form as they exist currently. As discussed in the Draft EIR on page 3-16, the prior master plan anticipated demolition of several buildings that were part of the DeWitt General Hospital. The EIR for the prior master plan found that the project was consistent with the General Plan, stating the following:

Building and facility demolition included in the proposed project includes demolition of several structures of historical and architectural significance. Mitigation measures include a program of documentation and recordation. Additionally, it is important to note that individual structures by themselves are not architecturally significant, it is the

Responses to Comments

identified “district” that is significant. While future demolition of additional structures within the historic district is anticipated, it is also anticipated that representative samples of the buildings will be preserved. Through implementation of mitigation measures and ultimate preservation of some portion of the historic district, the intent of this policy will be met, although building demolition will remain a significant impact with respect to the provisions of CEQA.

- F-3** The comment identifies Auburn/Bowman Community Plan goals and policies related to preservation of historic resources and states that the Draft EIR analysis of land use and compatibility with the Auburn/Bowman Community Plan should acknowledge that the Auburn/Bowman Community Plan was completed before the DeWitt General Hospital buildings were determined to comprise a historic district. The comment states that the sections of the Auburn/Bowman Community Plan that address land use within the PCGC property and treatment of DeWitt General Hospital structures should be interpreted or updated based on the historic district determination.

The goals and policies referenced in this comment are similar to the Placer County General Plan goals and policies discussed in Response to Comment F-2. These goals and policies indicate a preference for protection of historic resources, but do not preclude demolition of buildings within a historic district. Specifically, subsection (e) of the cited policy (Policy IV.E.3.e) states, “protection of significant cultural resources is a priority over recordation and/or destruction.” Additionally, Auburn/Bowman Community Plan policy IV.E.5.e also recognizes that it may not be possible to retain all historic resources.

The comment is correct that at the time the Auburn/Bowman Community Plan was prepared, the historic district had not yet been identified. However, it was known that the buildings were originally constructed as part of the DeWitt General Hospital. The Auburn/Bowman Community Plan notes that the age and condition of many of the buildings provides an opportunity for redevelopment of the site. Because the Community Plan goals and policies do not preclude demolition of buildings within a historic district, there is no inherent inconsistency between the goals and policies and the development vision for the PCGC property.

- F-4** The comment questions how the planned demolition of the 35 historical features is not in conflict with the adopted policies of the Placer County General Plan or the Auburn/Bowman Community Plan.

As discussed in Responses to Comments F-2 and F-3, the Placer County General Plan and Auburn/Bowman Community Plan do not preclude demolition of buildings within a historic district, and the project is consistent with the Development Vision for the

PCGC property. Note that the historic resource within the project site is a historic district; none of the existing buildings has been determined to be a historic resource independently. Thus, the buildings are not considered historic structures; rather, they are contributing features to a historic district. Page 5-24 of the project's Draft EIR states, "the project is consistent with the County's policies regarding historic resources because all of the existing structures within the site have already been identified and documented, the proposed PCGC Master Plan Update would implement the Development Vision enumerated in the Community Plan, and the proposed project includes retention of 15 of the contributing features within the historic district."

Although the proposed demolition would not be inconsistent with the Placer County General Plan or Auburn/Bowman Community Plan, Draft EIR Chapter 8, Cultural Resources, found that the demolition of 35 features (including 34 buildings and the swimming pool) within the historic district would be a significant and unavoidable impact.

F-5 The comment questions why the Historic Building Codes for rehabilitation are not noted in Mitigation Measure 8a, and why there are no feasible mitigation measures available for the Health and Human Services building when Alternative 3 shows a different location for the Health and Human Services building to avoid demolition of historic structures. The comment states that there is no analysis or discussion of why Alternative 3 was not selected, and that the EIR should include a mitigation measure requiring the County to encourage and consider adaptive reuse projects for all historic DeWitt General Hospital buildings as a priority over demolition.

The California Historic Building Code establishes engineering and construction standards for rehabilitation of historic buildings. It does not establish criteria that can be used to determine whether a specific set of building improvements would impair the historic significance of the resource. Rather, it is a tool that allows variation from the International Building Code standards to better fit with the context of a historic building. For example, certain design elements of a historic building may not meet current building codes related to seismic safety. The California Historic Building Code helps bridge the need to provide for an appropriate level of seismic safety while retaining the character-defining visual and structural elements of a historic building or resource. Mitigation Measure 8a refers to the Secretary of the Interior's Standards for Rehabilitation, the Guidelines for Rehabilitating Historic Buildings, and the Guidelines on Sustainability for Rehabilitating Historic Buildings because these documents provide metrics for determining whether a particular building improvement would detract from a resource's historic significance. These documents provide the information the County would need to consider to minimize or avoid reducing historic significance when making modifications to the retained buildings within the DeWitt General Hospital Historic District. However, text has been added to Mitigation

Measure 8a to refer to the County's ability to rely on the California Historic Building Code for future building modifications.

Relocating the Health and Human Services building to avoid demolishing structures within the historic district would require substantial changes to the overall conceptual land use plan. Due to the extent of changes in the proposed project that would result, this is not considered a feasible mitigation measure. Text has been added to Draft EIR page 8-28 to elaborate on the determination that there is no feasible mitigation for the impacts of the proposed Health and Human Services building to historic resources. As discussed in Chapter 20 of the Draft EIR, Alternative 3 proposes a different building footprint as part of an alternative conceptual land use plan for the project site. Alternative 3 would reduce the impact to historical resources by retaining a greater number of the buildings within the historic district, but would still result in a significant and unavoidable impact because it would alter the historic district through building demolition. Chapter 20 identifies Alternative 3 as the environmentally superior alternative. CEQA Guidelines Section 15126.6(a) states, "The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives." CEQA Guidelines Section 15126(c) states, "The EIR should briefly describe the rationale for selecting the alternatives to be discussed." The discussion of why an alternative was not selected over other alternatives is presented in the CEQA Findings of Fact, rather than the EIR, as described in CEQA Guidelines Section 15091.

F-6 Referring to Impact 8-5, which addresses cumulative impacts to cultural resources, the comment questions why there are no feasible mitigation measures for the historic buildings identified for demolition. The comment states that circumstances surrounding anticipated development can change over the anticipated 20-year buildout, and recommends that demolition of historic buildings should be avoided until new projects are approved. The comment suggests that the EIR include a mitigation measure preventing physical deterioration and premature demolition of these buildings until new projects are approved, such as mandatory routine maintenance and repair, prevention of historic building demolition prior to 60 days of the start of construction, and ensuring that all currently vacant DeWitt General Hospital buildings be occupied.

It is expected that buildings would be demolished as part of development of individual future projects. However, there may be circumstances when demolition of buildings outside the footprint of a new development project would occur prior to approval of new construction in that location. Further, the suggested mitigation measure would not substantially reduce or avoid the significant and unavoidable impact resulting from alterations to the historic district; thus, it is not required to be incorporated into the EIR.

Responses to Comments

F-7 The comment states that a specific time frame for all of the anticipated demolition be provided, as was done in the 2003 DeWitt Government Center Facility Plan EIR.

The Draft EIR provides a programmatic analysis of the PCGC Master Plan Update based on the proposed conceptual land use plan, tiering plan, a set of reasonable development projections for the project site, and the proposed land use and development regulations and guidelines presented in the PCGC Master Plan Update and accompanying documents. The actual mix of land uses that would be developed at the PCGC property and the specific timing for each individual future project are not known at this time. Providing a detailed demolition schedule for the program-level impact analysis is not required because it would involve speculation (CEQA Guidelines Section 15145 provides that speculation is not required in preparation of an EIR). Further, the level of detail regarding long-term buildout of the proposed PCGC Master Plan Update is consistent with the requirements in CEQA Guidelines Section 15146 regarding the degree of specificity required in an EIR. As noted in Response to Comment F-6, it is anticipated that demolition of the historical buildings would occur as part of the development of each individual project, however this is not a requirement of the project and there may be circumstances where demolition occurs before an individual project is approved. These projects would occur in the phases described in Draft EIR Chapter 3 and shown in Draft EIR Figure 3-8, which provide a general timeline of the planned demolition of the historic buildings. Finally, altering the timing of demolition would not alter the EIR conclusion that the project would result in a significant and unavoidable impact resulting from alterations to the historic district and would not substantially reduce the impact, thus it is not necessary for the EIR to include the suggested mitigation measure.

F-8 The comment states that the project descriptions of the two projects (the Health and Human Services building and Multifamily Residential project) are vague and that a project-level analysis should include more specific site plan detail and evaluation, consideration of site location and alternatives, parking and circulation analysis, and renderings of site plans and building elevations. The comment questions whether the information and analysis presented in the Draft EIR are sufficient.

The comment is correct that many project-level EIRs include more specific site plan details, but this level of detail is not required by CEQA. The Draft EIR defines the development assumptions for the two individual projects, including total building size, footprint area, maximum height, and the number of parking spaces required. The approximate building footprints and parking areas are indicated on the conceptual land use plan for the full project site provided in Draft EIR Figure 3-7. Building elevations and rendered site plans are not necessary to the analysis of the project's environmental effects. As described in the Draft EIR on page 9-21, the

building design for each individual project undertaken in implementation of the PCGC Master Plan Update must be consistent with the proposed Development Standards and Design Guidelines. Thus, those documents provide the performance standards that future project design, including the Health and Human Services building and the Multifamily Residential project, must attain. Each environmental impact analysis section of the Draft EIR includes a detailed description of the environmental effects of the two individual projects and the overall Master Plan Update. This includes Chapter 10, Transportation. The Transportation Impact Study (Draft EIR Appendix E) provides detailed trip generation and distribution assumptions, traffic volumes and level of service modeling and calculations, and mitigation measures for each of the two individual projects. Thus, the descriptions and analysis of these two projects meet the requirements in the CEQA Guidelines regarding adequate level of detail and degree of specificity (CEQA Section 15146).

F-9 The comment quotes text from page 3-7 of the Draft EIR and states that the statements are misleading because the County should not have relied on the 2004 State Historic Preservation Officer letter to justify demolition of additional DeWitt General Hospital buildings beyond those identified in the 2003 DeWitt Government Center Facility Plan EIR. The comment states that the criteria for determining if a property is a historical resource for purposes of CEQA are broader than that for the National Register of Historic Places (NRHP), thus the use of the letter as justification for CEQA clearance is not sufficient.

Pages 12-9 and 12-10 of the 2003 DeWitt Government Center Facility Plan EIR states that “the DeWitt General Hospital Historic District appears to be eligible as a historic district for the NRHP under Criteria A and C,” and that the “DeWitt General Hospital also appears to be eligible for the California Register of Historical Resources under Criteria 1 and 3 for the same reasons as those stated for the National Register.” This information was available to the SHPO at the time the 2004 determination was made that the property was not eligible for listing as a historic district. Thus, the County’s understanding of the 2004 letter as determining that the property was not eligible for listing either at the state or federal level was reasonable, appropriate, and based on substantial evidence.

CEQA requires that an EIR evaluate a proposed project in comparison to the existing physical environment. The EIR is not required to attempt to define or evaluate impacts associated with past activities at the project site, other than as those activities and impacts may relate to the cumulative impacts analysis. Thus, the validity of the County’s past reliance on the 2004 determination by the State Historic Preservation Officer is not a required component of the impact analysis for the proposed PCGC Master Plan Update. No further response is required.

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F-10 The comment states there should be more detailed information in Chapter 3, Project Description, regarding the magnitude of the proposed demolition, similar to the level of detail found in Chapter 8.

Although adequate detail regarding the magnitude of the proposed demolition is contained within the Draft EIR, additional details regarding the amount of demolition anticipated under the proposed PCGC Master Plan Update and as reflected in Draft EIR Figure 3-7, Conceptual Land Use Plan, has been added to Section 3.4.

F-11 The comment states that the proposed demolition of 35 of the 50 historical buildings does not comply with the adaptive reuse principle of the PCGC Master Plan Update.

The proposed PCGC Master Plan Update identifies adaptive reuse as one of its many guiding principles. This statement does not indicate a targeted amount of buildings or proportion of the historic district to retain for adaptive reuse. The proposed project would retain and provide for adaptive reuse of 15 of the buildings within the historic district. Further, there are several wide-ranging project objectives. The proposed PCGC Master Plan Update responds to each of them by finding a balance between competing ideas within the objectives. For example, the project includes the following four objectives, which each would be better supported with the construction of new buildings than by adaptive reuse of the existing structures due to factors such as efficient use of space, and modern requirements for functionality and sustainable resource use:

- Creates a vibrant community and campus by incorporating a diversity of land uses across the campus that include retail, multifamily housing, office, and mixed-use opportunities.
- Consolidates government departments to provide efficient delivery of public services.
- Establishes best practices for sustainable design, improves energy efficiency, and reduces average water consumption rates within the site.
- Provides office space that offers the amenities necessary to support employee functionality, productivity, and collaboration.

F-12 The comment states that the location of many of the proposed-to-be-demolished historical buildings is proposed for private development and questions how the County can justify the significant and unavoidable impact of the demolition of County-owned historical buildings for the benefit of private development, and that recommending demolition of these buildings seems premature given the anticipated 20-year buildout of the master plan.

Responses to Comments

Accommodating private development within the PCGC property is a key component of the project's objectives, which include the following:

- Identifies opportunities for development to maximize the value of the site.
- Identifies potential for public-private development opportunities at the site, best use being the PCGC commercially zoned areas.

Whether a project's adverse environmental impacts would be caused by private or public development activities does not change the level of significance of those impacts, and is not relevant per the requirements of CEQA.

F-13 The comment questions the timeframe for the proposed demolition, and the County's plans for the treatment of the historic DeWitt General Hospital buildings; the comment recommends the inclusion of specific information on timing and phasing of the project, as was done in the 2003 DeWitt Government Center Facility Plan EIR.

As noted in Response to Comment F-6, it is anticipated that demolition of buildings within the historic district would generally occur as part of the development of each individual project. These projects would occur in the described phases, which gives a general timeline of the planned demolition of the historic buildings. As stated in Response to Comment F-7, the level of detail regarding long-term buildout of the proposed PCGC Master Plan Update is consistent with the requirements in CEQA Guidelines Section 15146 regarding the degree of specificity provided in EIRs.

F-14 The comment states that no rationale is given regarding the land use designation or zoning changes requested for the PCGC Master Plan Update, and questions why the designations identified in the Auburn/Bowman Community Plan are no longer sufficient to justify the proposed change.

CEQA does not require that the rationale for a proposed change in land use designation be provided. Rather, it requires an analysis of the physical environmental effects of a proposed project and identification of mitigation measures and alternatives that could reduce or avoid such impacts. In this case, the proposed PCGC Master Plan Update defines the land use vision for the project site, and identifies the proposed land use and zoning designations that would accommodate the anticipated types and levels of development. The Draft EIR properly evaluates the physical environmental effects that could result from development under the proposed land use and zoning designations in relation to the existing conditions rather than the conditions that could exist under the existing land use and zoning requirements. CEQA does not require that the Draft EIR explain why the project could not be developed under the existing land use and zoning designations. Additionally, use of a land use designation that identifies the project site as a Master Plan area is consistent with

Responses to Comments

the County's treatment of other large-scale planning projects throughout the County, such as many of the County-adopted specific plans.

- F-15** The comment states that discussion or explanation of the non-applicability of the Surplus Land Act is missing from the Draft EIR (page 5-1).

Refer to Response to Comment E-6, which states that the requirements of the Surplus Land Act are not relevant to the analysis of the project's potential physical environmental effects and thus compliance with the Surplus Land Act is not evaluated in this EIR.

- F-16** The comment questions why goals and policies from the Placer County General Plan and Auburn/Bowman Community Plan related to cultural resources are listed in Chapter 8 but are not listed on pages 5-8 through 5-10.

The lists of Placer County General Plan and Auburn/Bowman Community Plan goals and policies on pages 5-8 through 5-10 identify those goal and policies that directly relate to land use and planning considerations. It is not appropriate or necessary to list the goals and policies related to cultural resources in the Land Use section.

- F-17** The comment states that the relevant Placer County General Plan policies were not listed in either Chapter 5 or Chapter 8, specifically, Policies 1.O.6, 1.O.7, 5.D.2, and 5.D.9. Additionally, the proposed demolition of 35 historical features is not in compliance with any of the policies in the Placer County General Plan or Auburn/Bowman Community Plan that pertain to the treatment of historic resources; thus, the land use impacts may be more than "no impact."

The policies listed in this comment have been added to the "Regulatory Framework" section of Chapter 8, Cultural Resources. Refer to Response to Comment F-2 regarding the project's consistency with these policies.

- F-18** The comment states that the Draft EIR analysis of land use compatibility and conformity/conflict with the Auburn/Bowman Community Plan on pages 5-24 and 5-25 should take into account that the Auburn/Bowman Community Plan was written well before the DeWitt General Hospital structures were determined to be a historic resource.

Refer to Response to Comment F-3 regarding the project's consistency with the Auburn/Bowman Community Plan.

- F-19** The comment states that the DeWitt General Hospital buildings are incorrectly referred to as "semi-permanent," whereas the NRHP nomination references a primary source from the War Department identifying DeWitt General Hospital as having only permanent buildings.

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The Draft EIR references an additional source (Brosin undated) that identifies the DeWitt General Hospital as one of 12 hospitals constructed in the “Semipermanent Type A” plan. This source reviews the history of the various construction types for military hospitals constructed in the 1940s and differentiates the permanent and semipermanent construction types. It states, “During 1942, pressure from the Veterans’ Administration to build hospitals which could be converted to postwar use, thereby avoiding another World War I error, and civilian pressure from makers of brick and tile, materials proposed as substitutes for lumber, which was becoming scarce, caused the War Department to authorize a third type of hospital, a one-storied semipermanent type known as Type A.” This is summarized in Draft EIR pages 8-6 and 8-7.

F-20 The comment states that the Draft EIR does not include the importance of the hospital and its relation to Tarmo Pasto and Martin Ramirez, as documented in its NRHP nomination.

Tarmo Pasto is discussed on page 8-15 of Chapter 8, Cultural Resources; the section discusses his work as an art and psychology professor and his association with Martin Ramirez. Similarly, Martin Ramirez is discussed on page 8-15 of Chapter 8; the section discusses his contribution to Latinos in the arts and his residence at DeWitt State Hospital. The period of significance for the DeWitt State Hospital’s association with Ramirez is 1948 to 1963. No further response is required.

F-21 The comment states that there is a problematic use of the 2004 State Historic Preservation Officer letter as environmental clearance for the demolition of historic DeWitt General Hospital buildings.

Refer to Response to Comment F-9 regarding prior building demolition within the PCGC property.

F-22 The comment states that page 8-12 is incorrect regarding the percentage (50%) of brick hospital structures remaining, since the NRHP nomination clearly states that approximately 60% of the DeWitt General Hospital structures remain. The comment states that there are a number of incorrect statements regarding the hospital; the comment corrects this by stating that the NRHP nomination indicates that the DeWitt General Hospital is significant under Criteria A in the area of health/medicine during its use as an Army General Hospital and as a state mental hospital; Dr. Norman Freeman pioneered vascular surgical techniques while stationed at DeWitt General Hospital; its association with Tarmo Pasto, a notable early pioneer in the study of artistic expression and psychology theory whose research was important to the establishment of art therapy as a treatment for mental illness; operation of the DeWitt General Hospital was locally significant, since its construction and operation as a World War II Army general hospital and later as a state mental hospital constituted the Auburn area’s driving economic force and the community’s largest employer from the

Responses to Comments

period 1943 to 1972; and the correct periods of significance for DeWitt General Hospital under Criteria A are 1943–1945 and 1946–1963.

Text has been added to Draft EIR page 8-15 to recognize the significance of the DeWitt General Hospital under Criterion A associated with its use as a state mental hospital and its association with Dr. Norman Freeman and with Tarmo Pasto.

F-23 The comment states that no discussion or rationale is provided in the Draft EIR for why the theater, adjoining patient wards, auditorium, and gym cannot be retained and adaptively reused, although Notice of Preparation (NOP) comments requested this.

Draft EIR page 8-1 recognizes that comments on the NOP requested that Placer County consider retention and adaptive reuse of several existing buildings within the property. The Draft EIR evaluates the project as proposed. The Draft EIR states on page 8-26 that the project proposes to demolish several of the contributing and non-contributing features of the historic district to allow for construction of new facilities. This is in support of the project objectives as defined in Draft EIR Section 3.3. The analysis of Alternative 2 and Alternative 3 provides consideration of alternative project designs that would accommodate retention of the theater and adjoining patient wards and the degree to which these alternatives may alter the environmental effects of the proposed project.

F-24 The comment states that the NOP comments noted the need for compliance with local regulations, but there is no discussion in Chapter 8 regarding compliance with the Auburn/Bowman Community Plan or the Placer County General Plan regarding these plans' goals and policies for retaining historic structures.

Compliance with local regulations and the goals and policies of the Auburn/Bowman Community Plan and Placer County General Plan are analyzed in Chapter 5, Land Use, under Impact 5-2, which found the following relating to cultural resources: "The Placer County General Plan and Auburn/Bowman Community Plan both encourage preservation of historic resources. The Community Plan includes a policy requiring that 'structures of historic or architectural significance shall be identified and documented, and efforts shall be made to preserve them and use them as a focal point in community design.' ... The project is consistent with the County's policies regarding historic resources because all of the existing structures within the site have already been identified and documented, the proposed PCGC Master Plan Update would implement the Development Vision enumerated in the Community Plan, and the proposed project includes retention of 15 of the contributing features within the historic district." As such, Impact 5-2 was found to be less than significant. Refer to Responses to Comments F-2 and F-3 for additional discussion of the project's consistency with the Placer County General Plan and Auburn/Bowman Community Plan.

Responses to Comments

F-25 The comment summarizes language from Draft EIR page 8-33 and states that the swimming pool was filled in after completion of the photographic recordation of the DeWitt General Hospital campus. The comment questions how the loss of this historic DeWitt General Hospital structure would be mitigated.

The swimming pool was included in the photographic recordation of the campus. As discussed previously, individual structures by themselves are not architecturally significant; it is the identified “district” that is significant. Thus, it is not necessary for the impact analysis or mitigation measures to address individual structures. The loss of the swimming pool is considered part of the overall changes to the historic district. The Draft EIR concludes that the anticipated changes to the historic district, including loss of the pool structure, would result in a significant and unavoidable impact, and there is no feasible mitigation that would avoid or substantially reduce this impact.

F-26 The comment states that the Historic American Buildings Survey standard documentation is considered a last-resort mitigation measure, would be unacceptable according to the Auburn/Bowman Community Plan, and should not necessarily be the default mitigation measure for the currently proposed project.

As discussed in Response to Comment F-3, Auburn/Bowman Community Plan Policy IV.E.3.e states, “protection of significant cultural resources is a priority over recordation and/or destruction.” This language does not prohibit recordation, such as Historic American Buildings Survey photographic recordation. Thus, reliance on the prior photographic recordation is not unacceptable according to the Auburn/Bowman Community Plan. In fact, recordation is the industry-standard mitigation strategy when significant changes to a historic resource cannot be avoided. However, as recognized in the Draft EIR, recordation is not considered sufficient mitigation to reduce an impact to less than significant. The Draft EIR correctly concludes that the impacts to the DeWitt General Hospital Historic District would be significant and unavoidable.

F-27 The comment states that the Draft EIR indicates that the theater and adjoining patient ward buildings retain a greater degree of original construction than other buildings within the project site. The comment questions the justification of the demolition of these buildings, stating that they are key iconic buildings. The comment states that Draft EIR page 20-4 provides deceptive information in stating that the majority of these buildings have been vacant for many years, when they were occupied as late as 2014/2015 and were vacated because the County did not renew leases for the building occupants in anticipation of a Costco store being constructed on the site. The comment refers to the building facilities assessment (Appendix A), which rates the buildings as fair and questions if they provide an accurate assessment given the fact that the DeWitt General Hospital buildings qualify for the California Historic Building Code.

Responses to Comments

Additional text has been added to Draft EIR page 20-4 to elaborate on the existing conditions of buildings within the 300 ramp. In summary, the condition assessment was completed to provide an inventory of the existing buildings. It does not consider whether the buildings are suitable for adaptive reuse; thus, the provisions of the California Historic Building Code were not relevant to the assessment.

The comment does not provide evidence or analysis to support the statement that these buildings are iconic. However, the Draft EIR recognizes that the buildings are considered contributing features to the DeWitt General Hospital Historic District.

F-28 The comment states that the DeWitt General Hospital buildings qualify for compliance with the California Historic Building Code as opposed to using current building code requirements, but the Draft EIR states that the DeWitt General Hospital buildings would need extensive improvements to meet California Building Code requirements.

The comment is correct that the buildings would qualify for compliance with the California Historic Building Code. Text on Draft EIR page 20-4 has been revised to refer to the California Historic Building Code. However, even under the California Historic Building Code, substantial modifications and improvements to the existing buildings would be necessary to make them viable for adaptive reuse and to provide an adequate level of life/safety protection.

F-29 The comment states that the Draft EIR incorrectly states that the DeWitt General Hospital buildings are/were a semi-permanent construction when the NRHP nomination references a primary source from the War Department identifying DeWitt General Hospital as a permanent facility.

Refer to the Response to Comment F-19 regarding the difference between permanent and semipermanent construction and the reference materials relied upon for the Draft EIR.

F-30 The comment questions if the number of housing units in Alternative 2 can be reduced in order to make it a viable alternative, noting that it would retain the theater and its adjoining patient wards.

Alternative 2 was developed to increase the intensity of residential land uses within the project site such that the County's project objectives could be attained while reducing the amount of demolition that would occur within the DeWitt General Hospital Historic District. As discussed in Response to Comment F-23, the configuration of existing buildings in the 300 ramp is not conducive to non-residential uses, thus, the additional buildings retained under Alternative 2 were assumed to be converted to residential uses. This led to the increase in the total number of dwelling units within the project site. In this

way, Alternative 2 also responds to the public comments on the NOP for this EIR that requested that the County increase the number of dwelling units for the proposed project.

Alternative 2 was not chosen as the environmentally preferred alternative because land use impacts would be increased compared to the proposed project, although they would remain less than significant, and because Alternative 2 would not avoid any of the project's significant and unavoidable impacts. However, these conclusions do not indicate that Alternative 2 is not viable. Further, the Draft EIR does not state that the increased land use impact under Alternative 2 would result from the increased number of dwelling units. Rather, as stated on page 20-22, the increased land use impact was identified as a result of the increased residential building height (up to five stories) and introduction of structured parking in the southeastern portion of the project site. These factors could lead to, among other things, land use conflicts with the neighboring single-family residential subdivision.

All of the project alternatives will be presented to the Board of Supervisors, along with the proposed project, for consideration. The Board of Supervisors may determine to deny the project, approve the proposed project, or approve one of the project alternatives. Consistent with CEQA requirements for consideration of project alternatives, the Draft EIR analysis of project alternatives is not presented at the same level of detail as the analysis of the proposed project. Thus adoption of one of the project alternatives may require additional environmental analysis.

F-31 The comment questions why Alternative 3 is not the preferred alternative, noting that this alternative lessens cultural, air quality, and greenhouse gases impacts. The comment states that the Draft EIR does not explain why the proposed project is the preferred alternative.

Draft EIR Section 20.5 does identify Alternative 3, Greater Historic District Retention through Increased Non-Residential Intensity, as the environmentally superior alternative for the reasons mentioned in this comment. This is different from the identification of a preferred alternative. The proposed PCGC Master Plan Update conceptual land use plan was developed to meet the specific project objectives identified in Draft EIR Chapter 3. As discussed in Response to Comment F-30, the selection of the preferred alternative would be made by the Board of Supervisors at the time that they consider approval of the proposed project or one of the project alternatives. CEQA requires that if the Board of Supervisors selects the proposed project rather than the environmentally superior alternative, the CEQA Findings of Fact and Statement of Overriding Considerations must document the reasons why the environmentally superior alternative was not selected. This explanation is not required to be presented in the EIR.

Responses to Comments

- F-32** The comment questions why Alternative 3 needs two parking structures when it has 44,915 square feet less than the proposed project.

Although the total number of required parking spaces would be reduced under Alternative 3, there would be less land area available for surface parking near the new and retained buildings. If parking structures were not incorporated into the land use plan for Alternative 3, there would be an increase in the overall development footprint and a decrease in the amount of open space and landscaped areas within the campus. This would not meet the basic project objectives of creating a vibrant mixed-use community and creating design that “promotes healthy, safe, productive, and comfortable indoor and outdoor environments” and identifying “opportunities for development to maximize the value of the site” because surface parking lots would consume some of the site’s development potential. Further, if parking is not provided sufficient proximate to buildings that the public must access to obtain County services, this would not meet the basic project objective of “provid[ing] efficient delivery of public services.”

- F-33** The comment requests clarification regarding why Alternative 3 is referred to as “increased non-residential intensity” when the total building square footage of 775,162 square feet is less than the 820,077 square feet of the proposed project.

Alternative 3 was developed by increasing the intensity of some individual buildings to accommodate the projected space needs for County departments in a reduced footprint such that more of the existing buildings could be retained for adaptive reuse. Although the development intensity would be reduced across the entire project site, the intensity within the County service thematic areas would be increased compared to the proposed PCGC Master Plan Update.

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Responses to Comments

Comment Letter G

—Original Message—
From: Tori Connolly [mailto:vconnol@prodigy.net]
Sent: Tuesday, December 25, 2018 5:35 PM
To: Paul Breckenridge
Subject: Dewitt Master Plan Public Comment Period

Please include this with public comments.

Relative to the residential portion of the project, no comment or discussion is made regarding the requirement that government land be first considered for affordable housing. Please comment what consideration was given to affordable housing. These multifamily units are not designated affordable. Placer has a homeless problem not unlike everywhere in California, due to lack of affordability. Please address fees in lieu in association with the Government Code section below. How will we be assured fees in lieu will not be applied. We need dedicated housing to accommodate workforce and disabled and elderly on fixed low income.

54220. (a) The Legislature reaffirms its declaration that housing is of vital statewide importance to the health, safety, and welfare of the residents of this state and that provision of a decent home and a suitable living environment for every Californian is a priority of the highest order. The Legislature further declares that there is a shortage of sites available for housing for persons and families of low and moderate income and that surplus government land, prior to disposition, should be made available for that purpose.

Thank you,
Victoria Connolly
223 Dairy Rd
Auburn, Ca 95603
Sent from my iPad

G-1

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Response to Comment Letter G

Victoria Connolly
December 25, 2018

G-1 The comment states that the Draft EIR does not discuss the requirement that government land be first considered for affordable housing and that the multifamily housing units are not designated affordable. The comment requests that the Draft EIR address the in lieu fees in association with the Government Code. Finally, the comment states that there should be dedicated workforce housing and for people with disabilities and older adults.

Refer to Response to Comment E-6, which states that the requirements of the Surplus Land Act are not relevant to the analysis of the project's potential physical environmental effects and thus compliance with the Surplus Land Act is not evaluated in this EIR. The 79 units currently planned for the Multifamily Residential project would be designated as affordable housing. The comment is correct that there is no commitment for any of the other multifamily residential units to be affordable for specific household income levels. However, by increasing the maximum allowable residential density to 30 dwelling units per acre, the proposed PCGC Master Plan Update allows for, encourages, and streamlines future housing development. Whether a project includes any units that would be designated as affordable housing would be evaluated at the time that specific project applications are submitted. It is expected that based on the size and characteristics of the dwelling units, the price points would be lower than single-family homes and thus would offer greater affordability for many segments of the population. This could include workforce housing. However, there are no commitments for housing to be targeted to specific groups. The suggestion in this comment that the project should have dedicated workforce housing and for people with disabilities and older adults addresses social issues rather than the physical environmental effects of the project. As provided in CEQA Guidelines Section 15131, "economic or social effects of a project shall not be treated as significant effects on the environment." Thus it is not necessary for the EIR to evaluate the need for housing to be dedicated to serve certain segments of the population.

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December 31, 2018

Shirlee Herrington
3091 County Center Drive
Auburn, Ca

Subject: Draft EIR for the Placer County Government Center Master Plan

Dear Ms Herrington:

Thank you for the opportunity to comment on the Draft EIR for the Placer County Government Center Master Plan. The following are my comments:

Notice of Preparation

1) The EIR needs to acknowledge that the NOP stated that the DeWitt mixed-use area would be retained for the Master Plan and even enlarged slightly. The project has been revised with a new land use designation and a combining zone district for the project which will double the site's density by increasing the maximum density from 15 units per acre to 30 units per acre. The EIR needs to acknowledge this change in the appropriate sections of the EIR such as the executive summary, NOP outreach, and scope of EIR analysis. A full disclosure of this change needs to be made in the prominent sections of the EIR.

H-1

Project Description

2) The Project Description summary (pages 3-13 and 14) needs to include that the proposed Auburn/Bowman Community Plan (A/BCP) Amendment will double the maximum density from 15 units/acre to 30 units per acre. Since this density increase will result in the PCGC as having the highest permitted density in Placer County, the project description should acknowledge this fact. The EIR needs to disclose the main difference between the existing and proposed land uses.

H-2

The County's objectives fail to acknowledge the County's desire to double the residential density and establish the PCGC as having the highest residential density in the County.

H-3

3) The Project Description summary (pages 3-13 and 14) needs to include a detailed accounting of the historic buildings that will be removed, including the phasing of the demolition of the historic buildings as it was so clearly noted in the 2003 DeWitt EIR. This is a very important aspect of the County's Master Plan; the Administrative EIR identified the removal of historic structures as a significant and unavoidable impact.

H-4

4) If a 100 unit project is proposed on a 3 acre parcel, does the proposed project exceed the proposed density of 30 units per acre? The project description should include the net acreage for this parcel.

H-5

5) The General Plan, Community Plan and Zoning Amendment that are currently located in Appendix B should be inserted into the project description to allow for transparency and full disclosure, as this is critical information pertaining to the PCGC Master Plan Update. Typically, appendices are used for the technical studies.

H-6

A Community Plan Amendment and Zoning amendments are major entitlements. Yet, this information is not presented in a clear and straight forward manner. This information is not disclosed until it appears in the middle of a discussion on pages 3-16 and 5-22 of the EIR.

Responses to Comments

6) More detailed information is needed in the project description for the Multi-Family Residential projects, since this a project level EIR for the 79 and 100 unit multi-family projects and the HHS building. The type of information required for a project EIR is discussed on page 2-3 of the EIR. A project specific EIR needs to contain sufficient details to ensure that the proposed projects can still be accommodated on the three acre parcel. Please note that simply stating a project will comply with adopted standards/guidelines without demonstrating the compliance could be considered as "deferred mitigation" and does not provide an adequate analysis. It appears the only plans provided for the 79 unit multi-family and HHS buildings are the grading plans and the site plans, landscape plans, etc. are not provided. There are no such plans provided for the 100 unit multi-family project. At a minimum, the following needs to be included:

H-7

Multi-Family Projects

- The bedroom breakdown for the 79 and 100 unit projects in order to determine parking requirements.
- State whether subterranean parking is provided for either project? It appears on the grading plan that there are parking stalls located under three buildings. Or, are these existing stalls to be removed? It is very difficult from looking at the grading plan to determine exactly what the project will look like.
- Detailed site plans that demonstrate whether the parking areas comply with parking lot design standards for both the 79 and 100 unit project.
- Building elevations for the 79 and 100 unit projects.
- Lighting plan with details on building and freestanding lights for both projects.
- Landscape plans for both projects.
- The number of units that will be affordable to each of the following income households (very low, low, and moderate), how long the units will remain affordable, and what mechanisms will be used to guarantee affordability for both projects.
- If the 79 unit project is constructed, will the remaining 21 affordable units be required in the subsequent multi-family projects?

H-8

HHS building

- Detailed site plans that demonstrate the parking areas comply with parking lot design standards
- Building elevations.
- Lighting plan with details on building and freestanding lights for both projects.
- Landscape plans for both projects.
- Clarify the phasing plan.

H-9

Since this is a project level EIR, the EIR should state whether these projects will need exemptions for the standards and guidelines that will be adopted for the Master Plan. For example, it appears that the parking lot design does not comply with parking islands or shading requirements.

H-10

If the additional information is not provided, then the draft EIR should only be a program EIR since it lacks sufficient detail to evaluate the projects.

H-11

7) Pages 3-2 to 3-7 should expand the site's history by stating the County ultimately demolished 92 residential units in the Bell Garden Apartments.

H-12

2

Responses to Comments

8) It appears that the project description does not mention a minimum density. This information needs to be included and evaluated. The density ranges should also be included on Figures 3-5 and 3-6 so as to be consistent with other County land use and zoning maps.

H-13

9) On page 3-25 - the discussion of the Commercial Planned Development (CPD) Zone District is misleading because it gives the impression that the density at DeWitt would allow for one residential unit per 2,000 Square feet of site area under the current land use designation. The discussion needs to be revised to ensure the CPD designation would only allow for this density if the proposed land use designation allows for that density.

H-14

10) The proposed Town Center is a combining zoning district. The discussions in the EIR refers to the Town Center as an overlay. The discussion in the EIR should be consistent with the Zoning Ordinance terminology and it should be referred to as a combing district in the EIR to avoid confusion.

H-15

Land Use

11) The Surplus Land Act (54000-54233) is not mentioned under the Regulatory section of the EIR as requested in the Notice of Preparation. The intent of the Surplus Land Act is that there is a shortage of sites available for persons and families of low and moderate income as well as park and recreational sites. Government surplus land, prior to disposition, should be made available for these purposes. If the County has determined that this act does not apply to the project, a detailed explanation for this determination is required. For instance, is the County relying on a loophole in the law or has the proposed project been revised in such a manner that this law is not applicable?

H-16

12) Placer County General Plan Goal 5.D "To identify, protect, and enhance Placer County's important historical, archaeological, paleontological, and cultural sites and their contributing environment." has been omitted from the listing of general plan policies applicable to the project in the Land Use section. The following cultural policies should also be listed: 5.D.1, 5.D.2, 5.D.6, 5.D.7, 5.D.12. Since DeWitt has a historic designation, this goal and policies are applicable to the project and should be listed in chapter 5 since the removal of most of these buildings is considered a Significant and Unavoidable impact.

H-17

13) A/BCP Cultural Resource Element Goal 2(a) "Preserve and enhance significant historical, cultural, and/or archeological sites and the surrounding area" has been omitted from the listing of general plan policies applicable to the project as well as policies 3(a) and 3(e) have not been included in the land use section. Since DeWitt has a historic designation, this goal and policies are applicable to the project and should be listed in chapter 5 since the removal of most of these buildings is considered a significant and unavoidable impact.

H-17

14) Impact 5-2- The discussion on the proposed land use change from a maximum of 15 units/ac to 30 units per acres needs additional analysis. The current maximum density in the PCGP is 21 units per acre with the exception of the regional University Specific plan which is 25 units per acre. The proposed change will result in the PCGC as having the highest density in the County. It is acknowledge that a density of more than 15 units/acre is necessary to provide affordable housing for the community, but why is a density of 21units/acre or 25 units/acre not adequate? There needs to be a discussion as to why these densities were not adequate in order to achieve the County's objectives.

H-18

15) Impact 5-2 – It is critical to note that at the time the A/BCP was prepared, the historic significance of the DeWitt Center had not been recognized. In 2015, the DeWitt center was

H-19

recognized as a historic district. **This historic recognition changed the existing conditions at DeWitt. The land use discussion in the EIR needs to recognize this fact and not assume that because the DeWitt mixed-use development vision does not address the preservation of historic buildings, it means that the need to preserve historic buildings should be minimized.** For this reason, it is important to incorporate the goals and policies from the Cultural Resource Element into the land use analysis. The existing DeWitt Center Mixed-use discussion is now inadequate when it comes to historic preservation.

H-19
Cont.

16) As previously noted, there are no detailed plans for the 100 unit multi-family project in the EIR. Once the plans have been incorporated into the EIR and evaluated, it will provide a good indicator as to whether the County property can support a density of 30 units/acre.

H-20

Population and Housing

17) On page 6-5, last paragraph, the numbers from the 2017 Housing Element Report should be changed to reflect a total of 6 deed restricted and 44 non-deed restricted moderate income households and 289 above moderate income households.

H-21

18) The housing discussion on the history of DeWitt needs to acknowledge that the Bell Garden Apartments provided affordable housing to the community until the County removed all 92 units over an extended period of time.

H-22

19) Although the Bell Garden Apartments were removed several years ago and is not considered as part of the existing conditions for the EIR, the DeWitt Center Mixed-Use discussion in the A/BCP states: "There is a need to replace the Bell Garden Apartments with new construction, yet also with low cost units. The County could ensure that this happens by making land available and assisting in the construction of necessary infrastructure". The County appears to be making a commitment to replace these affordable units.

H-22

20) Impact 6-1 Induce Substantial Population Growth (pg 6-13)- The proposed land use change not only doubles the residential density proposed for the DeWitt Center, it sets a precedent by creating the highest density permitted in Placer County. The current maximum density permitted by the Placer County General Plan is 21 units per acre and the maximum density permitted by the Regional University Specific Plan is 25 units per acre. The discussion for this impact needs to at least acknowledge this is a significant change for the immediate area and reevaluate whether the conclusion that the impact is less than significant is still warranted.

H-23

21) Impact 6-2 "Impairs the County's ability to meet the RHNA targets or increase demand for affordable housing". **The Auburn/Bowman Community Plan EIR, on pages 3-1 and 4-18, identified the "long-term affordable housing ratio as a Significant and Unavoidable impact without an increase in multi-family designated land".** It has 25 years since the County determined that the affordable housing ratio would result in a Significant and Unavoidable impact in the long term. Based on this finding, the lack of affordable housing should, in 2019, be considered a Significant and Unavoidable impact. It should be noted that after the A/BCP was adopted in 1994, some actions by the County further impeded the County from meeting its RHNA numbers such as:

H-24

- The following single family subdivisions were approved on land zoned for multi-family: Stonebrook, Atwood II, Olympus Village, and Atwood III. With the exception of 15 affordable units required for Atwood III, none of these units were sold at a price affordable to very-low, low, or moderate income households. The cumulative impact of the County approving these

developments is that the significant and unavoidable impact has only been made more significant.

- In Table A-1 of the 2013 Placer County Housing Element Background Report (planned and approved project with affordable housing units), it shows the Timberline development as requiring 78 low-income housing units. However, according to the Planning Department, Timberline is not required to provide any deed-restricted affordable housing units. It is not known at this time why this discrepancy exists. However, with the exception of Quartz Ridge Apartments, the list of potential projects providing affordable housing for the A/BCP area is very limited.

An argument that can be made about how this project may impact the RHNA numbers is that there is very little opportunity in the A/BCP area to provide affordable units. There is limited available land located outside the overflight zone, that is also near shopping and employment opportunities, and also where urban services (water, sewer, etc) can readily be provided. In a way, the PCGC is one of the few areas left where affordable housing can be provided in not only the A/BCP area, but the larger surrounding rural areas. Therefore, the discussions on the various housing impacts needs to be revised since affordable housing is considered to be a Significant and Unavoidable impact, based on the 1994 A/BCP EIR. In addition, if the PCGC Master Plan and/or the HHS has the potential to increase the demand for affordable housing, this increase could be considered a significant and unavoidable impact.

22) In section 6.3, a criterion for significance is whether the project will impact the County's ability to meet its RHNA's obligations. As part of the discussion on this issue, it would be beneficial if the EIR included a table based on the Annual Placer County Housing Element Progress Reports submitted to HCD showing the number of affordable housing units constructed in the last eight years or so and compare this with the County RHNA's allocation. With the exception of the Quartz Ridge apartments, there has been very limited affordable housing development in not only the A/BCP area, but also in the County. Since the County has approved several single-family housing projects on Multi-family zoned land, the amount of land available to support affordable housing is very limited. This may impact the County's ability to meet its RHNA numbers.

23) It should be acknowledged that multi-family development is not longer synonymous with affordable housing, as was the situation in 1994 when the A/BCP was adopted. However, in 2019, that is no longer the situation. One of the County's objective is to provide multi-family housing. It should be clarified whether this objective includes affordable housing.

23) Will the water and the sewer system at the PCGC be upgraded to increase capacity? These systems are old and may not have been designed for the intensity of the proposed development. If the systems are being upgraded, would this be considered growth inducing?

24) Impact 6-4 -The discussion for this impact makes an inaccurate statement that the Housing Element does not assume that any of the County's affordable housing demand would be met within the PCGC campus. This statement needs to be removed from the document. The following are examples that support the argument that the County always intended affordable housing would be provided at the PCGC:

- In the DeWitt Center Mixed-Use discussion in the A/BCP, it states: "There is a need to replace the Bell Garden Apartments with new construction, yet also with low cost units. The County could ensure that this happens by making land available and assisting in the construction of necessary infrastructure".

H-24
Cont.

H-25

H-26

H-27

H-28

H-29

H-30

- On page 64 of the Placer County Background report dated 8/1/2013 states that “The County-owned DeWitt Center is strategically located in the center of North Auburn and is considered an appropriate affordable housing location. The County has identified sites appropriate for higher density and mixed-use development”.
- Table A-2 in the 2013 Housing Element Background Report list the following inventory of vacant parcels with higher Density residential uses that could provide affordable housing: Parcels 051-120-064, 065, and 067. Three of the seven parcels noted in the Project location discussion on page 3-2 have been identified in the 2013 PC Housing Element as being sites for affordable housing.

H-30
Cont.

Cultural Resources

25) The EIR has identified the removal of the historic structures as a Significant and Unavoidable and yet it is not clear from the project description as to when the structures will be removed. It would seem that historic building should not be removed until a specific project has been approved and is ready to be constructed. Otherwise, until an approved project is ready to be constructed, the impact would certainly be considered “avoidable”. It is important that the mitigation measures for cultural resources consider the timing as to when the structures are to be demolished, especially when the Master Plan covers a 20-year period.

H-31

Recreation

26) The discussion on Recreation needs to include the swimming pool as an existing recreational amenity. According to an email from the Facility Services Director dated June 27, 2016 (attached), the County placed fill material in the pool as a safety precaution and guaranteed that the County did not damage the pool. The email further states that “In the future when and if a final determination on the pool is made, the material can be removed and the pool renovated, demolished or whatever course of action is eventually decided”. Although the pool may appear to be damaged, it is not. Otherwise, the County would have been responsible for destroying an historic amenity without obtaining the proper approvals.

H-32

- Since the pool was not destroyed by the fill material, the EIR should discuss how the short term impact of placing fill material in the pool was deemed to be reversible and the existing conditions of recreational amenities at the PCGC needs to include the swimming pool.
- The Recreation section needs to discuss the long term impact of the pool being demolished as is proposed by the proposed project. Mitigation measures for the removal of the pool need to be identified for the destruction of the pool. The loss of a pool in the Auburn area, where the summer temperatures often exceed 100 degrees, is an unfortunate loss.

Lighting impacts

27) Impact 9-4 Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Here are some comments on this impact

- There is limited discussion on the type of light fixtures proposed in the EIR and the Master plan documents. One of the major sources of glare are the use of non cutoff light fixtures. There is noticeable glare in the existing County complex related to the use of non cut-off light fixtures, particular with building lights. A simple mitigation measure to reduce the source of glare is to require the use of full cut-off light fixtures.
- On page 44 of the Development Standards, a one (1) footcandle average minimum is required. This seems like a high minimum standard for an area with relatively low ambient lighting. This standard seems more typical of a large urban area. Since appropriate lighting levels are relative

H-33

H-34

to the surrounding area, a standard that works for one environment may not work in another. How was this lighting level determined? Was a study done on the ambient light levels in the PCGC area to determine that this minimum lighting level would not be significantly brighter than the surrounding area? Determining appropriate lighting levels can be very complicated. It is important to know how this minimum lighting level was determined.

H-34
Cont.

Project Alternatives

28) The analysis of the project alternatives should include an evaluation of a maximum project density of 21 units per acre (based on the maximum permitted by the Placer County General Plan) and 25 units per acre (based on the maximum permitted in the Regional University Specific Plan). Since the changes to land use occurred after the NOP was processed, there was no opportunity to request this analysis.

H-35

General comments

29) All comments submitted on the EIR should appear verbatim in the Final EIR.

H-36

30) The Draft EIR needs to be recirculated, or at least the portions that need to be substantially revised based on section 15088.5 of the government code because:

- The project level analysis required for the HHS building and the 79 and 100 unit multi-family projects lacks sufficient detail to be considered a project EIR.
- The impact to affordable housing has already been identified as significant and unavoidable based on the 1994 A/BCP and the population and housing section. The Population and Housing section needs to be revised to reflect the significant and unavoidable impact.
- The discrepancy between project as described in the NOP and the project description in the EIR should be clarified and disclosed that there was a significant change.
- The project description is incomplete at the beginning of the document. A detailed description is needed so it can be clearly understood what the is entailed for the Master Plan, HHS, and the multi-family projects. This information should not be parceled into the various sections of the EIR or failed to be presented.

H-37

Sincerely

Charlene Daniels

Attachments

Email from the Facility Services Director dated June 27, 2016

ref: PCGC Master EIR comments

Responses to Comments

-----Original Message-----

From: Ken Grehm <KGrehm@placer.ca.gov>
To: 'Kay Fegette' <kayhf@aol.com>
Cc: Laurie Morse <LMorse@placer.ca.gov>
Sent: Mon, Jun 27, 2016 8:32 am
Subject: RE: Public Records Act Request 6/16/16
Hi Ms Fegette:

I pasted in your questions from your first email so I could reply to all your questions in one email. We have placed soil within the pool to prevent anyone from being injured in and around the pool area. Members of the public were bypassing the fence and utilizing the pool area, apparently for entertainment. The pool is in place and was not broken up. In the future when and if a final determination on the pool is made, the material can be removed and the pool renovated, demolished or whatever course of action is eventually decided.

Ken Grehm

I noticed that a large amount of fill material has been placed in the DeWitt pool. I am requesting the following information:

- 1) What permits (i.e. grading permit) were issued for the fill material? No permits were issued or sought. Material was placed in the pool to prevent a potential public hazard.
- 2) What type of environmental clearance was done to allow the fill material to be placed? I do not consider the temporary placement of material a project and no clearance was sought.
- 3) What reports were prepared for this project? We do not consider it a project. There is no permanent change and no reports were prepared.
- 4) Can you provide any correspondence between the County and the Office of Historic Preservation on this matter? There would be no correspondence with SHPO that I am aware of.

Thank you for your attention to this matter

Response to Comment Letter H

Charlene Daniels
December 31, 2018

H-1 The comment states that the EIR must acknowledge that the Notice of Preparation (NOP) stated that the project site would remain under the mixed-use land use designation, but the project has changed to include creating a new land use designation and combining zone district that would increase the maximum density within the project site from 15 units per acre to 30 units per acre.

Text has been added to Chapter 2, Introduction, regarding the proposed change in land use designations relative to the statements in the NOP. The project intensity and design are largely consistent with the project description provided in the NOP. The existing and proposed maximum allowable residential density is also stated on Draft EIR page 5-22.

H-2 The comment states that the project description should include the proposed Auburn/Bowman Community Plan amendment regarding maximum density, noting that the Placer County Government Center (PCGC) property would have the highest density in Placer County.

The requested entitlements and necessary permits to support approval and implementation of the proposed PCGC Master Plan Update (project) are listed in the Draft EIR in Section 1.7 of the Executive Summary in Table 1-1, and Section 3.6 of the Project Description. These sections include brief descriptions of the proposed Placer County General Plan, Auburn/Bowman Community Plan, and Zoning Ordinance amendments; the full text of the proposed Placer County General Plan and Auburn/Bowman Community Plan amendments are provided in Draft EIR Appendix B. Text has been added to Draft EIR pages 1-4 and 3-15 to provide more details of the proposed amendment related to the maximum allowable residential density under the proposed project.

H-3 The comment states that the objectives fail to mention that Placer County desires to double the residential density in the county.

As directed by CEQA Guidelines Section 15124(b), the project objectives define the underlying purpose of the project. Doubling the residential density is not one of the County's objectives for the proposed project. Rather, as stated in Draft EIR Section 3.3, the central objective is to develop a vibrant mixed-use community that includes multifamily residential, governmental offices, commercial, and retail land uses. The proposed increase in residential density is a mechanism to support the project

Responses to Comments

objectives and to support the County's goals for development of affordable and workforce housing.

H-4 The comment states that the project description should include a detailed account of the buildings that are proposed to be demolished, as was clearly noted in the 2003 DeWitt Government Center Facility Master Plan EIR.

The 2003 DeWitt Government Center Facility Master Plan, which was the project evaluated in the 2003 EIR, was a much smaller planning effort than the currently proposed PCGC Master Plan Update. It documented the County's plans for four new construction projects and a series of sequential building demolitions. In contrast, the currently proposed project establishes land use, zoning, development standards, and design guidelines for the campus that future development projects must meet. The County intends that private developers would design and construct the non-governmental land uses envisioned in the PCGC Master Plan Update. Although the project defines generally anticipated phasing of development in four tiers, as shown in Draft EIR Figure 3-9, the actual timeline for buildout of the campus would be dependent on the real estate market and the interests of private developers. Thus, it is not possible to specifically define a building demolition schedule, because demolition would generally occur in association with individually approved development projects undertaken with implementation of the PCGC Master Plan Update.

H-5 The comment asks if the proposed 100-unit project on the 3-acre parcel exceeds the proposed density of 30 dwelling units per acre, and states that the project description should include the net acreage.

The comment is correct that, at a maximum density of 30 dwelling units per acre, a 3-acre site would support a maximum of 90 dwelling units. However, state law allows a local agency to approve a density bonus for development of affordable housing. To ensure that the impact analysis did not understate the impacts from the upper range of possible development on the site, the development projections assumed that 100 units would be constructed. As stated in the Draft EIR on page 3-26, "The Multifamily Residential project located at 1st Street and B Avenue is currently proposed to include 79 dwelling units, although this EIR evaluates a maximum development of up to 100 dwelling units at this location."

H-6 The comment states that the contents of Appendix B (General Plan, Community Plan, and Zoning Amendment) should be included in the project description for transparency, and that the major entitlements Community Plan Amendment and Zoning Amendment are not presented in a straightforward manner and should appear earlier than pages 3-16 and 5-22 of the Draft EIR.

As discussed in Response to Comment H-2, text has been added to Draft EIR pages 1-4 and 3-15 to provide more details of the proposed General Plan, Community Plan, and Zoning Ordinance amendments. The organization of the Draft EIR is described in Section 2.5. Chapter 1 presents an Executive Summary of the Draft EIR and is intentionally less-detailed than other chapters of the Draft EIR. Thus, it is appropriate that the descriptions of requested entitlements and necessary permits and approvals are brief. Chapter 2 presents a general introduction to the Draft EIR and does not discuss any of the details of the proposed project. Chapter 3, Project Description, begins with a detailed description of the existing setting and conditions within the project site and in the project vicinity, then presents the project objectives. The detailed description of the proposed PCGC Master Plan Update begins on page 3-14. It is appropriate that the information regarding the proposed General Plan, Community Plan, and Zoning Ordinance amendments appears in this portion of the Draft EIR.

H-7 The comment states that more detailed information is needed in the project description for the two project-level EIRs and notes that stating that a project will comply with adopted standards/guidelines without demonstrating compliance is deferred mitigation.

The Draft EIR includes sufficient information about the two individual projects to allow for meaningful and comprehensive environmental review. The proposed PCGC Master Plan Update and development standards identify specific performance standards that the individual projects must attain. Particularly with a development plan such as a Master Plan, specific details of subsequent projects may not be available, and mitigation measures may be developed to address these circumstances. Mitigation is not deferred if the lead agency (the County) commits itself to the mitigation, and adopts specific performance standards the mitigation will achieve. In this case, the County has committed to the mitigation, and identified the relevant adopted regulatory standards that must be achieved. The County has provided information regarding the subsequent projects, and there is no substantial evidence that the subsequent projects would not achieve the required standards. Refer to CEQA Guidelines Section 15126.4(a)(1)(B), *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899; and *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261.

H-8 The comment states that the plans for the Multifamily Residential project need to include a bedroom breakdown to determine parking requirements, state whether subterranean parking is provided as it appears that in the grading plan there are stalls located under three buildings, a detailed site plan with compliant parking lot, building elevations, lighting plan, landscape plan, number of affordable units and how long they will remain affordable, and if the remaining 21 affordable units will be required in future projects.

Responses to Comments

The final design of the Multifamily Residential project would be reviewed by the County through the design/site review process, as noted in Draft EIR Section 3.6. In addition, the County will review the project details to ensure conformance with the development standards adopted for the PCGC Master Plan Update, similar to the process for review of future individual development projects described in Draft EIR Sections 2.2 and 3.5. The design/site review process would include verifying that the parking lot includes sufficient parking spaces and landscaping to meet the parking standards identified in the proposed PCGC Master Plan Update and associated development standards. As discussed in Response to Comment H-7, reliance on a future review to verify that the project meets the adopted development standards does not constitute deferred mitigation. Further, the development standards provide sufficient information on which to base the environmental impact analysis.

The comment is correct that some parking stalls are anticipated to be placed below a portion of the building. The spaces would not be below grade. Rather they would be tucked under the second story of the building. The grading plan includes approximate volumes of cut-and-fill necessary to construct the proposed buildings, parking lot, and other site amenities. This information provides a sufficient level of detail to evaluate the environmental effects associated with grading.

Similar to the parking lot design, the County will review building elevations, lighting, and landscaping as part of the design/site review process to ensure they comply with the PCGC Master Plan Update development standards and design guidelines. For example, the development standards establish a maximum building height of 50 feet. The County will verify that the buildings meet this standard before approving the site improvement plans and issuing building permits.

The PCGC Master Plan Update does not include a commitment to construct 100 affordable housing dwelling units. As noted in Response to Comment H-5, the estimate of 100 units was used for planning and impact analysis purposes. Current plans for the Multifamily Residential project propose construction of 79 units of affordable housing. There is no commitment to construct an additional 21 units of affordable housing. As discussed in Response to Comment E-5, this would constitute 16% of the total dwelling units projected to be constructed within the PCGC property, which exceeds the County's requirement for projects that include a General Plan amendment to increase residential density to provide for construction of affordable housing dwelling units equal to a minimum of 10% of the total units constructed.

H-9 The comment states that the plans for the Health and Human Services project need to include detailed site plans with compliant parking lots, building elevations, lighting plan, and landscape plan, and to clarify the phasing plan.

Responses to Comments

Similar to the discussion of the Multifamily Residential project in Response to Comment H-8, the Draft EIR contains sufficient information about the Health and Human Services building on which to base the environmental impact analysis. The County will review the site plan, building elevations, lighting plan, and landscaping plan as part of the site/design review process before approving the improvement plan and issuing a building permit. As discussed in Response to Comment H-7, reliance on a future review to verify that the project meets the adopted development standards does not constitute deferred mitigation. The Health and Human Services building is expected to be constructed in a single phase; thus, there is no phasing plan for that project.

H-10 The comment states that the Draft EIR should state whether or not the Health and Human Services building or Multifamily Residential project will need exemptions from the proposed development standards and design guidelines, noting that it appears that the parking lot design does not comply with requirements for parking islands or shading.

The grading plans shown on Draft EIR Figures 14-4 and 14-5 provide the general layout of the parking lots, but do not include landscaping or other associated site improvements. As discussed in Responses to Comments H-8 and H-9, the final parking lot designs would be reviewed by the County as part of the site/design review process. No exemptions from the PCGC Master Plan Update development standards and design guidelines are anticipated to be required.

H-11 The comment states that the Draft EIR should only be a programmatic EIR if it lacks sufficient detail to evaluate the proposed Health and Human Services building and Multifamily Residential project.

As discussed in Responses to Comments H-8 and H-9, the Draft EIR contains sufficient details of the two individual projects and the associated environmental impacts to meet the CEQA Guidelines requirements for a project-level analysis. The Draft EIR includes all of the required contents of an EIR as described in CEQA Guidelines Article 9, and provides quantitative analysis, where applicable, of the potential impacts associated with each of the individual projects.

H-12 The comment states that pages 3-2 through 3-7 should include a statement recognizing that the County demolished 92 residential units in the Bell Garden Apartments.

Text has been added to Draft EIR Table 3-2, on page 3-7, indicating the last use of buildings that were demolished between 2004 and 2014. This information does not affect the environmental impact analysis or conclusions reached in the Draft EIR.

Responses to Comments

H-13 The comment states that the project description should include minimum density, and Figures 3-5 and 3-6 should include the density ranges to be consistent with other County land use and zoning maps.

The project does not propose to establish a minimum allowable density for residential uses. The intent of Figures 3-5 and 3-6 is to identify the specific boundaries of the proposed land use and zoning designations for the project site. It is not necessary to identify the allowable residential density ranges in these figures, and it is not necessary for the figures to be consistent with other County land use or zoning maps. The lack of density information on these figures does not affect the environmental impact analysis or conclusions reached in the Draft EIR.

H-14 The comment states that page 3-25 is misleading because it suggests that the current zoning designation for the project site allows one dwelling unit per 2,000 square feet. The comment states that the Draft EIR should be revised to state that this density would only be allowed if the proposed land use designation allows it.

Section 17.20.010 of the Placer County Code defines the allowable land uses and development standards within the Commercial Planned Development zone district. Section 17.20.010.E states, “Residential Density. Allowed density for multifamily residential development shall be one unit for each two thousand (2,000) square feet of site area.” However, the comment is correct that the maximum allowable density under the land use designation for the project site must also be considered. The Auburn/Bowman Community Plan designates the site as Mixed Use and states that residential development under this land use designation should have a density ranging from 6 to 15 dwelling units per acre. Text on Draft EIR page 3-25 has been revised to reflect the allowable maximum density under the Mixed Use land use designation. The existing and proposed maximum residential density is also stated correctly on Draft EIR page 5-22.

H-15 The comment states that the proposed Town Center district is combining zoning and is not an overlay, and that the EIR discussion should be consistent with Zoning Ordinance terminology.

Text revisions have been made throughout the Draft EIR to change “zoning overlay” to “combining zoning district.” Revisions were made on the following pages: 3-15, 3-26, 3-27, 5-1, 5-22, 5-23, and 12-22. This revision does not change the nature or extent of the anticipated development within the PCGC property, and does not affect the Draft EIR analysis or conclusions.

Responses to Comments

H-16 The comment states that the Surplus Land Use Act is not included in the Draft EIR, although it was requested in response to the NOP. The comment summarizes the Surplus Land Use Act, and questions why it is not applicable to the project.

Refer to Response to Comment E-6, which states that the requirements of the Surplus Land Act are not relevant to the analysis of the project's potential physical environmental effects and thus compliance with the Surplus Land Act is not evaluated in this EIR.

H-17 The comment states that General Plan Goal 5D and Policies 5.D.1, 5.D.2, 5.D.6, 5.D.7, and 5.D.12 and Auburn/Bowman Community Plan Cultural Resources Element Goal 2A and Policies 3A and 3e should be included in the Land Use section of the Draft EIR.

As stated in Response to Comment F-16, the Land Use section of the EIR lists the goals and policies that directly relate to land use and planning considerations. It is not appropriate or necessary to list goals and policies related to cultural resources in the Land Use section.

H-18 The comment questions why 21 or 25 dwelling units per acre is not sufficient for affordable housing and states that the proposed land use density of 30 dwelling units per acre would be double the existing density and would be the highest in the County.

The Draft EIR evaluates the environmental effects of the project as proposed. This includes consideration of the proposed maximum allowable density. The commenter is correct that there are no other locations in the County where 30 dwelling units per acre is allowed; however, this information does not pertain to the environmental effects of the proposed project. Consideration of whether a lower density could support affordable housing is also not relevant to the analysis of the proposed project's environmental effects. No response is required.

H-19 With regards to Impact 5-2, the comment notes that the Auburn/Bowman Community Plan was completed before the historical significance of the DeWitt General Hospital area was recognized, and this recognition changed the existing conditions; the previous mixed-use vision for the site did not include this change, and as such does not address preservation of the historic buildings. The goals and policies from the Cultural section of the Draft EIR should be incorporated into the Land Use section.

Refer to Response to Comment F-3 regarding the project's consistency with the Auburn/Bowman Community Plan, including with respect to the inclusion of the DeWitt General Hospital Historic District on the National Register of Historic Places. As stated in Response to Comment F-16, it is not appropriate or necessary to list goals and policies related to cultural resources in the Land Use section of the EIR.

Responses to Comments

H-20 The comment states that there are no detailed plans for the 100 multifamily housing units in the Draft EIR, and that it would provide a good indicator as to whether the area can support 30 dwelling units per acre.

Refer to Responses to Comments H-5 and H-8 regarding the available level of detail regarding the Multifamily Residential project. The comment does not identify specific concerns related to potential constraints of the project site in supporting the proposed density. The Draft EIR provides a comprehensive analysis of the physical environmental effects of the project, including consideration of the proposed maximum allowable density. Thus, the Draft EIR considers the ability of the project site to support the proposed density.

H-21 The comment states that page 6-5 needs to be revised to include the six deed-restricted and 44 non-deed-restricted moderate-income households and the 289 above-moderate-income households.

Text on page 6-5 has been revised to correctly report the number of affordable housing units that were constructed or permitted in 2017.

H-22 The comment states that the history of housing in DeWitt needs to include the affordable housing provided by Bell Gardens, especially since the Auburn/Bowman Community Plan acknowledges the need to replace the 92 units.

The Draft EIR properly evaluates the impacts of the proposed project in relation to the existing conditions at the time that the environmental review began, as provided by CEQA Guidelines Section 15126.2(a). The background information regarding prior land uses at the project site is provided for context, but does not affect the environmental impact analysis or conclusions. As noted in Response to Comment H-12, text has been added to Draft EIR Table 3-2, on page 3-7, indicating the last use of the buildings that were demolished between 2004 and 2014.

H-23 The comment states that the proposed maximum density on site is double the current density, and analysis is needed regarding this significant change for the immediate area and to reevaluate whether the conclusion is still less than significant.

The Draft EIR evaluates the density as proposed. The proposed increase in allowable density applies only within the project site and would not affect other parcels in the project region. The environmental effects associated with higher residential densities that could have adverse effects outside of the project site have been evaluated in the Draft EIR. For example, the Draft EIR evaluates the effects associated with increased traffic and noise volumes that may result from the proposed residential development.

Responses to Comments

H-24 With regards to Impact 6-2, the comment states that, based on the Auburn/Bowman Community Plan's long-term affordable-housing impact finding of significant and unavoidable, the lack of affordable housing should be considered a significant and unavoidable impact in 2019. Additionally, the comment states that some actions impeded the County from meeting Regional Housing Needs Assessment (RHNA) obligations, including four single-family developments that were approved in multifamily zoning, the approval of which worsens the cumulative impact.

Refer to Response to Comment E-3, which states that the PCGC Master Plan Update Draft EIR recognizes that there would be a significant cumulative impact associated with demand for affordable housing, and Response to Comment E-4, which demonstrates that the proposed PCGC Master Plan Update would not make a cumulatively considerable contribution to that impact.

H-25 The comment states that Table A-1 of the 2013 Housing Element Background Report shows a required 78 affordable housing units in the Timberline development, but the Planning Department states that Timberline is not required to provide any deed-restricted affordable housing units. The comment states that affordable housing in the Auburn/Bowman Community Plan area is limited.

Refer to Response to Comment E-3, which states that the PCGC Master Plan Update Draft EIR recognizes that there would be a significant cumulative impact associated with demand for affordable housing. The Draft EIR conclusion is consistent with this comment, and reflects the limited extent of affordable housing in the Auburn/Bowman Community Plan Area. The obligations of the Timberline development regarding affordable housing are not relevant to the environmental impact analysis for the proposed PCGC Master Plan Update.

H-26 The comment states that there is little available land outside of the PCGC campus and within the Auburn/Bowman Community Plan area and surrounding rural areas that could accommodate RHNA-qualifying housing. The comment states that discussions regarding the housing impacts and needs should be revised, especially if the PCGC Master Plan Update and/or the Health and Human Services building has the potential to increase the demand for affordable housing.

Refer to Response to Comment E-4, which demonstrates that the Placer County Housing Element assumed development of five units of affordable housing within the PCGC property, and the proposed project would exceed that by constructing approximately 79 units. Approximately 16% of the dwelling units constructed under the proposed project would be affordable housing, which exceeds the County's requirement for private development to provide for affordable housing development at a minimum of 10% of the new units, whether through construction of those units or payment of in-lieu fees.

Responses to Comments

The Draft EIR evaluates the potential for the project to increase the demand for affordable housing in Impact 6-2. The potential number of new jobs that could be supported within the project site is evaluated on pages 6-17 and 6-18.

H-27 The comment suggests the addition of a table based on the Annual Placer County Housing Element Progress Report comparing the number of units constructed versus the County's allocation as a part of Section 6.3 regarding the County's RHNA obligations. The comment states that there has been very little affordable housing built, with the exception of the Quartz Ridge apartments, and since then, the County has approved single-family housing within multifamily housing zoning.

Considerations regarding the supply and demand for affordable housing throughout Placer County and specifically within the Auburn/Bowman Community Plan do not inform the analysis of the environmental effects of the proposed project. Refer to Response to Comment E-3, which states that the PCGC Master Plan Update Draft EIR recognizes that there would be a significant cumulative impact associated with demand for affordable housing, and Response to Comment E-4, which demonstrates that the proposed PCGC Master Plan Update would not make a cumulatively considerable contribution to that impact.

H-28 The comment states that multifamily development is no longer synonymous with affordable housing, and the objectives should clarify the County's meaning.

Refer to Response to Comment E-8 which clarifies that the units within the Multifamily Residential project are the only ones that are committed to be constructed as affordable housing units. Some of the other multifamily units may meet the housing needs of other segments of the county's population, such as workforce housing and housing affordable to young families and older adults.

H-29 The comment questions whether the water and sewer system at the PCGC property would be upgraded to increase capacity, and if so, would those improvements be considered growth-inducing.

The Draft EIR analysis of growth inducement recognizes that the on-site water and sewer infrastructure would be upgraded to ensure sufficient capacity to serve the project. Draft EIR page 21-5 states "The proposed PCGC Master Plan Update would not require extension of infrastructure to any undeveloped areas and would not increase the capacity of the public service and utility systems that serve the site. Infrastructure upgrades would be completed throughout the project site to improve service efficiency and serve the proposed new buildings on site. These upgrades would not increase the ability of service providers to serve currently undeveloped areas in the project region." Section 21.4 of the

Responses to Comments

Draft EIR concludes that the project would not induce growth “that surpasses the regional projections or contravenes local land use plans and zoning designations.”

H-30 The comment states that the statement in Impact 6-4 that the Housing Element does not assume any of the affordable housing demand would be within the PCGC campus should be deleted because the Auburn/Bowman Community Plan states that there is a need to replace the Bell Garden Apartments with new construction, and the County could ensure it happens by making land available; the Placer County Background Report (8/1/2013) states that the DeWitt Center is strategically located in the center of North Auburn and would be appropriate as an affordable housing location, and Table A-2 in the 2013 Housing Element Background Report lists three parcels associated with the PCGC Campus as sites for affordable housing.

Refer to Response to Comment E-4, which demonstrates that the Placer County Housing Element assumed development of five units of affordable housing within the PCGC property, and the proposed project would exceed that by constructing approximately 79 units. Approximately 16% of the dwelling units constructed under the proposed project would be affordable housing, which exceeds the County’s requirement for private development to provide for affordable housing development at a minimum of 10% of the new units, whether through construction of those units or payment of in-lieu fees.

H-31 The comment states that the Draft EIR is not clear about when the demolition of the historical resources will occur, and suggests that no demolition occur until a specific project has been approved and should be reflected in the appropriate mitigation measures.

Refer to Response to Comment F-6 which explains that it is expected that, in general, buildings would be demolished as part of development of individual future projects, however this is not a requirement of the project and there may be circumstances where demolition occurs before an individual project is approved.

H-32 The comment states that, as shown in the June 27, 2016, Facilities Services Director email attached to the comment letter, the pool is not damaged and the fill that was placed in the pool can be removed without destroying it. The comment suggests that the EIR discuss why the fill material in the pool was deemed to be reversible, and that the Recreation section needs to discuss the swimming pool and the long-term impact of the pool being demolished, as proposed in the Master Plan Update, and mitigation measures need to be included.

Fill was placed in the swimming pool before the environmental review of the proposed PCGC Master Plan Update commenced, and therefore represents an existing condition within the project site. At the time the pool was last available for use, it was operated

as part of the Courthouse Athletic Club, which was a private recreation facility. The pool was only available for use by members of Courthouse Athletic Club. This facility relocated to another site in the North Auburn area, but no longer has a swimming pool available to its members. Since the pool was not available for public recreation, demolition of this facility would not reduce the availability of public recreation facilities in the project area.

The Draft EIR evaluates the potential for the PCGC Master Plan Update to result in adverse effects to public recreation in Impact 17-2. The analysis finds that the new residential population that would be accommodated by the proposed project would be expected to use off-site recreational facilities. On page 17-14, the Draft EIR states that all of the residential land uses within the PCGC campus would be constructed as part of individual private development projects, and each such project would be required to meet the Placer County General Plan requirement to either dedicate land and/or pay fees in accordance with state law to ensure funding for the acquisition and development of public recreation facilities. The Draft EIR concludes that compliance with the County General Plan requirements for land dedication and/or payment of in-lieu fees would be sufficient to ensure that there are adequate public recreation facilities to support the increased population. Thus, there is no significant impact that would be reduced by retention of the existing swimming pool.

H-33 With regard to Impact 9-4 related to lighting, the comment states that there is limited discussion regarding the type of light fixtures proposed, as one major source of glare is non-cutoff light fixtures and there is a noticeable glare from the existing County complex. The comment suggests that a mitigation measure that requires the use of full cut-off light fixtures be included.

Full cut-off light fixtures are required by the California Building Code, with which all new structures at the project site must comply. Additionally, the Development Standards address the need to use cut-off light fixtures. Thus it is not necessary for the EIR to include a mitigation measure requiring the proposed development standards to include this requirement.

H-34 With regard to Impact 9-4 related to lighting, the comment states that the minimum requirement of 1 foot-candle average is high for a low-ambient lighting area, and questions how this standard was determined.

The requirement to have a minimum of 1-foot-candle of light is an industry-standard requirement that provides for an adequate level of lighting to ensure safety and appropriate illumination of sidewalks and walkways.

Responses to Comments

H-35 The comment states that the Project Alternatives should include one in which maximum project density is evaluated at 21 units per acre and 25 units per acre.

CEQA requires that the alternatives selected for analysis be those that are considered feasible to implement and would obtain most of the basic project objectives while reducing or avoiding the proposed project's significant environmental effects. An alternative that considers maximizing the residential density at the project site would not meet the County's basic project objectives of providing a vibrant mixed-use community that allows the County to capitalize on private development opportunities.

H-36 The comment states that all comments should appear verbatim in the Final EIR.

All of the comment letters received by the County in response to the Draft EIR appear in Chapter 2 of this Final EIR. The letters are printed with all of their original content; the only modification to the comment letters has been to add brackets and numbering to distinguish each individual comment, as described in Chapter 1 of this Final EIR.

H-37 The comment states that the Draft EIR needs to be recirculated, since the project-level analysis is insufficient, the impact of affordable housing has been identified as significant and unavoidable based on the 1994 Auburn/Bowman Community Plan EIR, there is discrepancy between the project description in the NOP versus the EIR, and the project description in the EIR is incomplete.

No significant new information has been added to the Draft EIR in response to the comments received. As discussed in Response to Comment F-1, recirculation of the Draft EIR is not warranted.

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Responses to Comments

Comment Letter I

From: Kay Fegette <kayhf@aol.com>
Sent: Tuesday, January 01, 2019 7:56 PM
To: Shirlee Herrington
Subject: EIR - Surplus Land Act

Ms Herrington:

Thank you for the opportunity to comment on the EIR. Unfortunately, I have had not had time to adequately review the EIR as I have been in Italy for the holiday season with my family. However, I did notice that the EIR did not discuss the Surplus Land Act and since the County plans on using surplus land for non governmental uses, the EIR needs to address this important law. Why the County continues to feel this law can be ignored should also be explained. I have attached a letter to the editor I submitted several years ago to the Auburn Journal about the County's reluctance to follow this law. These comments are as a valid today as they were then.

The Surplus Land Act required that, prior to disposing of public property, the county must make a written offer to sell or lease the property for the purposes of developing affordable housing, park or recreation uses, school construction or other purposes contained in Government code section 54222. The intent of the Surplus Land Act is to use surplus government property to provide for underserved community needs.

Why isn't the county following an important state law? The county evicted the very uses that are supported by this law including a senior center, a theater and arts academy, an adult school and a gym. The county also removed the Bell Garden apartments with a promise that they would be replaced. It has not happened yet and the plans presented at the DeWitt Mater Plan meeting indicate that only a portion of the workforce housing may be replaced. How did this happen? Why did the county fail to comply with this law twice when it entered into lease negotiations with Costco? Did the county comply with this law when Home Depot was proposed?

Kevin Hanley (Another View: "Seizing North Auburn's opportunity," Sept. 2) is correct in his recent article about DeWitt Master Plan update in that "they are not making anymore land." The county has a precious resource with the public lands under their purview. Why did the county not first address basic community needs such as housing, senior welfare and a community center before adding more commercial to what already seems like an overly commercialized North Auburn?

The county's discussions with Costco were always premature in light of all the public policy issues that needed to first be addressed. Unfortunately, the lease agreement between the Costco and the county not only derailed the normal planning process, but also prevented Costco from seeking more appropriate locations such as being near the freeway where such a high traffic generating use should be located in the first place.

Sincerely

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Response to Comment Letter I

Kay Fegette
January 1, 2019

I-1 The comment expresses appreciation for the opportunity to comment, although acknowledges the inconvenience of the comment period over the holidays. The comment states that the EIR does not address the Surplus Land Act, and questions why the County of Placer (County) continues to ignore this law. The comment also attached a past “Letter to the Editor” outlining concerns regarding the Surplus Land Act, which summarizes the Surplus Land Act and states that the County failed to comply with the law twice when it entered into negotiations with Costco and leased land to Home Depot.

Refer to Response to Comment E-6, which states that the requirements of the Surplus Land Act are not relevant to the analysis of the project’s potential physical environmental effects and thus compliance with the Surplus Land Act is not evaluated in this EIR.

I-2 The comment states that land is a precious resource and questions why the County did not first address basic community needs such as housing, senior welfare, and a community center before adding more commercial.

Consistent with the project objectives listed in Draft EIR Section 3.3, the proposed Placer County Government Center (PCGC) Master Plan Update (project) provides for development of a mixed-use community that includes housing and commercial and office space. As discussed in Draft EIR pages 3-13 and 3-14, the proposed “mix of land uses reflects the square footage needed to support future County facility needs and the County’s ability to capitalize on likely market opportunities” and “the development projections for the PCGC property were determined based on a detailed assessment of the existing and future space needs for each County department located at the site as well as a local market analysis that considered the potential for the site to support private commercial and residential uses” [citations deleted from original quotation]. Further, development of a mixed-use community is consistent with the planning principles expressed in the Auburn/Bowman Community Plan, which include encouraging mixed-use “development on the larger developable parcels of land and within designated areas where redevelopment may occur. A balance of compatible commercial, industrial, residential, civic uses, enjoyable public places, and parks will enhance the communities sense of identity and interaction, as well as address traffic congestion, air quality, and affordable housing issues.”

The project would include an Community/Events Center within the proposed Community Thematic Area. The Community/Events Center land use is intended to

Responses to Comments

serve as a community center. Text has been added to Draft EIR page 3-17 explaining the expected uses of the Community/Events Center. Thus, the proposed project addresses the community needs mentioned in this comment while also addressing other community needs as expressed in the project objectives.

- I-3** The comment states that the County’s discussions with Costco were premature due to public policies, and that the lease agreement derailed the normal planning process.

The County’s discussions with Costco occurred several years before the proposed PCGC Master Plan Update was initiated and are unrelated to the currently proposed project. The comment does not address the environmental effects of the proposed project or identify any inadequacies or inaccuracies in the Draft EIR. No response is required.

Comment Letter J

From: Liz Johnson <bookliz@hotmail.com>
Sent: Tuesday, January 01, 2019 5:26 PM
To: Placer County Environmental Coordination Services
Cc: Jim Holmes
Subject: Attn Shirlee Herrington Re Master Plan

Hello,
I am writing with my concerns\thoughts about the Placer County Master Plan DEIR.

1st and foremost, I think it is wrong to have the public comment period over a holiday when people are out of town and/or are busy with family and holiday activities. This makes it seem as though you are not really interested in getting comprehensive public comments. Please consider extending the comment period.

J-1

2nd: It is vital that you keep ALL 100 affordable housing units and even add more if at all possible. I'm sure you are well aware of the housing crisis in Placer County (and all of California) – and your department's history of allowing developers to renege on their affordable housing commitments AFTER the public comment is despicable. By my estimation – there are literally hundreds, if not thousands, of families who have been denied affordable housing over the past many years because of your shady past practices. Whenever you see a homeless person – I hope you will wonder if that person might be housed if it wasn't for your own immoral and deceptive practices. In summary, affordable housing MUST be the # 1 priority.

J-2

3rd: I do not think you should demolish the theatre, the barracks or any other existing\historical buildings until if and when there is a good, public approved plan in place. You've already displaced a number of community organizations and businesses (i.e. people) by jumping the gun in past. Let's keep our historical buildings if possible.

J-3

4th: I believe DeWitt is a better location for the Community Center. This puts it near senior and low-income housing, as well as county offices and many businesses. This would seem to me the natural place for community to be able to congregate.

J-4

Most Sincerely,

Elizabeth Johnson
Placer County resident and concerned citizen.

Sent from [Mail](#) for Windows 10

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Response to Comment Letter J

Elizabeth Johnson

January 1, 2019

J-1 The comment provides introductory remarks. The comment states that the comment period over the holidays gives the appearance that comprehensive public response is not wanted and states that the comment period should be extended.

The Draft EIR was circulated for 45 days, consistent with CEQA Guidelines Section 15105. The review began November 19, 2018, and ended January 2, 2019. The County of Placer (County) welcomes public comments on the proposed project and Draft EIR.

J-2 The comment states that all 100 affordable units should be developed as opposed to past instances when other developers have built fewer affordable units than promised.

The Placer County Government Center (PCGC) Master Plan Update (project) includes one approximately 3-acre site that is proposed to support affordable housing and accommodate development of multifamily housing at a maximum density of 30 dwelling units per acre within the Multifamily Residential Thematic Area, which includes 24 acres, and the Mixed Use Thematic Area, which includes 17 acres. Because the specific details of the affordable housing development were not available at the time the Draft EIR analysis commenced, the analysis assumed a maximum unit count of 100 dwelling units within the affordable housing component, referred to in the Draft EIR as the Multifamily Residential Project. However, the Draft EIR also states multiple times (for example, refer to page 3-22) that the current planning for this project indicates that 79 units would be constructed. As discussed in Response to Comment E-5, construction of 79 units of affordable housing represents 16% of the total dwelling units anticipated to be constructed on site. This would exceed the County's goal identified in the Placer County Housing Element Policy B-14 to "consider requiring 10 percent affordable units, payment of an in-lieu fee, or comparable affordable housing measure(s) acceptable to the County, for any General Plan amendment that increases residential density."

J-3 The comment states that the theater, barracks, and any other historical buildings should not be demolished unless a public-approved plan is in place to avoid unnecessarily displacing existing building occupants.

As discussed in Response to Comment F-6, it is expected that buildings would be demolished as part of the development of individual future projects. However, there may be circumstances when demolition of buildings outside the footprint of a new development project would need to be removed prior to approval of new construction

Responses to Comments

in that location. This would not alter the conclusions of the Draft EIR regarding the significant and unavoidable impact to the DeWitt General Hospital Historic District.

J-4 The comment states that DeWitt General Hospital would be a better location for a community center, because it would be proximate to senior and low-income housing, along with County offices and businesses.

Refer to Response to Comment I-2, which states that the Community/Events Center proposed within the Community Thematic Area is intended to serve as a community center and that additional text has been added to Draft EIR page 3-17 to elaborate on the expected uses of the Community/Events Center.

January 2, 2019
Shirlee Herrington
3091 County Center Drive
Auburn CA

RECEIVED
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CUPA

Subject: Draft EIR for the Placer County Government Center Master Plan

Dear Ms. Herrington:

Thank you for the opportunity to comment of the Draft EIR for the Placer County Government Center Master Plan. I do feel that the Planning Department did not take into account the convenience for the public, setting a very short timeframe to respond and that the response period fell over the Christmas Holidays. I know it has made it difficult for me. At the same time, I am delighted to see this project moving forward. It has the potential of addressing a great many needs of the Auburn community as well as centralizing more services that the county provides to Placer County's residents.

K-1

I am concerned about a number of issues:

AFFORDABLE HOUSING – the plan calls out for around 100 much needed affordable housing units. Placer County has a history of showing affordable housing in a number of big developments, but that number is reduced or disappears by the time the development is actually built. It is my understanding the developers have been allowed to give a donation to some program or charity in lieu of constructing those houses. We have an affordable housing crisis in this county and I have heard a lot of talk but a lack of follow thru on the part of the Planning Department and our Board of Supervisors. Affordable housing provides the opportunity for people (teachers, nurses, firefighters, police officers, small business owners, start up tech companies, our kids who have gotten a degree or some type of vocational expertise) to build a future in our town. Home ownership allows people to invest in their future and potentially have something to pass on to their kids. This sham policy has got to stop. It is immoral and fails to provide one of the basic needs of the very people in our community that serve us every day. Bottom line, I want to see all 100 AFFORDABLE HOUSING UNITS at DeWitt built.

K-2

COMMUNITY CENTER – Based on the input from the planning meetings with the public, the DeWitt property was the number one choice for the Community/Senior Center. This will be convenient to county employees, the families that will live in the 100 units mentioned above, the seniors who will be living in the big new development across Bell Road and the general public of the Auburn area. Bus transportation is available. How nice is that!! I do not like the idea of a Community Center built adjacent to a big church. DeWitt was a great location for the former Senior Center which was prematurely evicted and should be the home of the future Community/Senior Center. I would suggest a swimming pool as a much needed addition.

K-3

Responses to Comments

DEWITT THEATER – I would like to see the theater preserved and used. The building is in good shape. It is a great venue for the arts (local schools can use), lectures, plays, graduations, concerts etc. It is a historical building of the WWII era with some good stories.

K-4

These are the few thoughts I could put together in this short review time during the holidays. I did attend the recent DEIR meeting at the Planning Department on December 13th. I will be following this project as it unfolds. Remember...affordable housing, affordable housing, affordable housing!!! Thank you.

K-5

Sincerely,



Elinor Petuskey

Newcastle CA

Cc Supervisor Holmes

Supervisor Montgomery

P.S. Don't start removing historical buildings until you have a final plan. Keep your options open. Things change.

K-6

Response to Comment Letter K

Elinor Petusky
January 2, 2019

K-1 The comment expresses gratitude for the opportunity to comment, but notes the inconvenience of the comment period occurring during the holidays.

As stated in Response to Comment I-1, the Draft EIR was circulated for 45 days, consistent with CEQA Guidelines Section 15105. The review began November 19, 2018, and ended January 2, 2019.

K-2 The comment states that all 100 affordable units should be developed as opposed to past instances when other developers have built fewer homes than promised. Additionally, affordable housing would help to alleviate the affordability issues and homeless problems.

Refer to Response to Comment J-2, which summarizes the amount of affordable housing anticipated to be constructed within the project site. As noted in Draft EIR page 3-22, although the Draft EIR analysis considers development of a maximum of 100 dwelling units within the Multifamily Residential project, it is currently expected that the site would accommodate 79 dwelling units.

K-3 The comment states that DeWitt General Hospital would be the perfect spot for a community/senior center, and would be convenient for County employees, families in the multifamily housing, and seniors across Bell Road with close bus transportation. Finally, the comment suggests a swimming pool should be provided.

Refer to Response to Comment I-2, which states that the Community/Events Center proposed within the Community Thematic Area is intended to serve as a community center, and that additional text has been added to the EIR to elaborate on the expected uses of the Community/Event Centers. At this time, a swimming pool is not proposed. However, the Draft EIR concluded that impacts associated with recreation would be less than significant. Thus, there is no significant impact that would be reduced with the provision of a swimming pool, and it is not necessary to require that one be included in the proposed project to mitigate project impacts.

K-4 The comment states that the theater should be preserved and used since it is still in good shape and still used for events.

Refer to Response to Comment F-23 regarding the existing condition of the theater and the reasons why retaining the theater would hinder the County's achievement of the basic project objectives.

Responses to Comments

K-5 The comment provides concluding remarks and emphasizes the importance of affordable housing.

Refer to Response to Comment K-2 regarding the proposal for provision of affordable housing.

K-6 The comment states that historical buildings should not be demolished until there is a final plan because things change.

No demolition would occur unless the proposed project is approved. As discussed in Response to Comment F-6, it is expected that buildings would be demolished as part of the development of individual future projects. However, there may be circumstances when demolition of buildings outside the footprint of a new development project would need to be removed prior to approval of new construction in that location. This would not alter the conclusions of the Draft EIR regarding the significant and unavoidable impact to the DeWitt General Hospital Historic District.

Responses to Comments

Comment Letter L

From: Jean Piette <jean39.piette@gmail.com>
Sent: Wednesday, November 28, 2018 8:19 PM
To: Placer County Environmental Coordination Services
Subject: Master Plan on Developing Dewitt area

Please be advised we are concerned about the initial report including an extensive increase in the potential population and in the traffic on the area streets. We already have added developments and their impact not yet felt, but, it is more than our community needs.

Respectively submitted,
James G. and Jean Piette
5495 Bell Road, Auburn, 95602
530 888 1340

L-1

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Response to Comment Letter L

James and Jean Piette

November 28, 2018

L-1 The comment identifies concern regarding increased traffic due to increased population, especially in conjunction with other approved developments.

The Transportation Impact Study (Draft EIR Appendix E) and Chapter 10, Transportation, of the Draft EIR provide a detailed analysis of the degree to which traffic volumes would increase as a result of the overall Placer County Government Center Master Plan Update, as well as the specific increases in traffic expected as a result of the Health and Human Services Building and the Multifamily Residential project. The comment does not identify any deficiencies or inaccuracies in the Transportation Impact Study or the Draft EIR, thus, no response is required. All of the comments on the Draft EIR will be reviewed by the Placer County Planning Commission and Board of Supervisors in their consideration of the project.

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