

February 16, 2019

**Chair and Members of the
Placer County Planning Commission
3091 County Center Drive #140
Auburn, CA 95603
Attn: Shirlee Herrington, Environmental Coordinator (sherring@placer.ca.gov)**

Dear Ms. Herrington and Chair and Members of the Placer County Planning Commission:

I have reviewed Placer County's Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan (SAP) and the Placer Ranch Specific Plan (PRSP). I am submitting the following comments, questions and concerns that I wish to be included in the public comments and addressed by the County.

4.2.1 Conversion of Farmland

This project would convert many acres of agricultural land to non-agricultural uses. The amount of acreage is of great concern to me for many reasons. The Placer County General Plan and the Placer Legacy Open Space and Agricultural Conservation Program have goals and policies that favor preservation of farm lands and minimize impacts to them. This DEIR seems in direct opposition to those goals and objectives, as this plan would eliminate 6% of the remaining farm land in the County. This is a loss to the county both economically and ecologically, but that isn't addressed in the DEIR. Where is that information? Surely there is a benefit that these lands provide as they are.

Farmland not only provides income and commodities, it helps in many other ways that would lessen the impacts of this project if that land is left in agricultural designation. While agricultural land does not provide the diversity and quality of habitat that designated preserve land does, it does offer needed foraging space for many different birds, including many of the species which are noted in the DEIR as being species of concern. The open land left in this general area supports one of the highest populations of wintering hawks in California. Tricolored Blackbirds use agricultural land and are in the vicinity. Agricultural lands also provide much appreciated visual buffers and relief from the suburban sprawl and bring people a peaceful visual respite.

This DEIR needs to address the value of all the benefits that these lands offer.

Mitigation measure 4.2-1a, 1b would have land elsewhere purchased to mitigate this loss of farmland. This will still result in the net loss of farmland in the county. How can this be considered a mitigation measure if the end result is loss of farmland, while the County states in the General Plan a goal is to preserve farmland?

4.5 Cultural Resources

4.5-1 In this section it is unclear if the TCR's are any of the previously recorded sites or isolated finds. Since the PRSP area received intensive pedestrian surveys, it seems that these areas would have been surveyed also. What is the correlation of the TCR's and the survey and the previously recorded sites and/or isolates?

4.5-2 The net SAR area needs to have a current archaeological pedestrian survey that will relocate the known and recorded sites. These sites and any other sites discovered must be evaluated for significance.

4.4-1 Biological Resources – Analysis, Impacts and Mitigation

The whole premise of the mitigation measures relies on the PCCP. The PCCP is not even in existence. Nothing has been approved or put into the county documents for this plan. How can this DEIR even be considered when many mitigation measures throughout the document refer to and depend upon a non-existent program? That being said as my overarching complaint with this DEIR, my specific comments continue.

Removing natural vernal pool habitat is not acceptable. There are special status species of plants and animals associated with the vernal pool habitat and there is no way to compensate for the loss of this unique habitat. Habitat creation is not a substitute for naturally occurring vernal pools. Vernal pools have a long history – thousands to millions of years in the making under unique conditions. That history is in the soils, topography, and genetics of the entire community of adapted species associated with that habitat. Many members of this community, especially the microorganisms involved, are still poorly known and understood. No constructed recreation can have that history. While there may be some success in getting certain parts of the ecological community established in constructed vernal pools, their long-term viability is not assured without the presence of the entire community and the conditions in which it can flourish. The mitigation areas seen from Athens Road where vernal pools have been constructed look nothing like the naturally occurring vernal pool areas. Pools do not naturally occur as regularly exact in size, spacing, or shape as these are. If all or most of the SAP area in the Reserve designation are constructed pools, then we are accepting those poor substitutes as the new reality of vernal pools, and losing the real, irreplaceable thing.

4.4.1 Regulatory Setting

The vernal pool recovery section mentions the Western Placer County core area. How does that area overlay on the SAP/PRSP area? A map is needed to supply that information. Since the goal of that plan is to retain 85% of remaining vernal pool fairy shrimp habitat in that core area, we need to know where that area is located. Why can this proposed plan be considered if it doesn't comply with the County's plan for vernal pools?

4.4.5-a Mitigation for special status animals

These measures again rely on the PCCP, a plan that does not exist as a County approved plan. There would be a considerable amount of land involved that would result in the loss of substantial habitat for numerous species. Once removed it is a net loss in the county and

the state. Buying mitigation credits does nothing for the net loss of habitat. These species of concern are getting pushed out in every direction. Do not further stress their populations. Do not further interrupt their corridors for movement.

4.3.6 *Objectionable Odors*

A look at the odor complaint and notification history map in 4.3-6 shows that the majority of complaints are from residences south of the landfill site and associated with the landfill. This is beyond the one-mile buffer zone currently in effect for residential development. The proposed PRSP seeks to reduce the buffer zone to 2000 feet. This will certainly dramatically increase the number of complaints. How will these complaints be handled? Since it would be a County initiated problem, it seems the County should be responsible.

The Western Placer Waste Management (WPWMA) provides a vital service to much of Placer County and it is the dominant feature of the area. This plan needs to acknowledge that feature and look for compatible development ideas for nearby land that respect the existing buffer zone exclusions for use. Residential development in the PRSP doesn't fit.

The only alternative of those proposed in the DEIR that would be acceptable is Alternative #1. – No project. The list of substantial impacts is too great. This DEIR has two aspects that seem to need addressing before any plan can be proposed for the SAP. First, the plan relies on the Pleasant Grove Retention Basin expansion before this area can be developed. That permission has not been obtained. Second, this plan relies heavily on the PCCP to solve many conservation issues. As stated previously, this plan is not an approved plan – only a concept. There is too much land involved that is subject to a high level of use that is not present there now. This proposed plan is a continuation of the plans of the 1990s that have gotten the surrounding areas into the urban sprawl situation they are in now – with attendant problems of bad traffic, no rapid transit, no natural habitat left, too many single-family homes, etc. What is needed is a clear vision for the future and this DEIR does not do this.

I do suggest a serious study of the Citizen Initiated Smart Growth Plan by all members of the Planning Commission. It provides a plan that carefully considers what is there now and a smart way to approach development in a much more compatible way with the land.

I do not appreciate or approve of the way this environmental document was produced. How is Placer County both the creator of the DEIR and the reviewer of it? Why is my tax money being used to create a specific plan document for the developer who will profit greatly by the project?

Sincerely,
Gayle Russell
A Placer County concerned resident of
English Colony Way
Penryn, CA