



SIERRA FOOTHILLS AUDUBON SOCIETY
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February 10, 2019

Shirlee Herrington
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603
cdraecs@placer.ca.gov

Re: Sunset Area Plan/Placer Ranch Specific Plan Draft Environmental
Impact Report (State Clearinghouse No. 2016112012)

Dear Ms. Herrington:

On behalf of the Sierra Foothills Audubon Society (SFAS), I am submitting our comments on the Sunset Industrial Area and Placer Ranch in Placer County DEIR. SFAS is an organization whose main geographical area of work is Placer and Nevada counties. We have the following concerns that we respectfully request be addressed by the County.

The DEIR Section 2.7 "Summary of Environmental Impacts and Recommended Mitigation Measures" lists mitigation measures (fixes) for all impacts. This letter concerns the impacts and mitigations relating to greenhouse gas emissions.

Impact 4.7-2: Operational greenhouse gas emissions

"Operation of the land uses developed under the net SAP area is estimated to generate 378,518 MTCO₂e/year at full buildout, and operation of the land uses developed under the PRSP area is estimated to generate 201,004 MTCO₂e/year at full buildout. These levels of GHG emissions have the potential to result in a considerable contribution to cumulative emissions related to global climate change and conflict with state GHG reduction targets. **This impact would be significant.**"

Various mitigations are proposed as noted below, but 4.7.2 still is considered **significant and unavoidable**.

Mitigation Measure 4.7-2a: Implement all feasible on-site features to reduce operational GHG emissions (Net SAP Area and PRSP Area)

Building Energy

Reduce GHG emissions associated with building energy through the following measures:

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to promote appreciation of and protection for birds and their habitats.*

- *Single family residential buildings constructed within the net SAP area and the PRSP area shall be designed to achieve a 30 percent reduction in energy use versus a standard 2016 Title 24 code-compliant building. Reductions in energy shall be achieved by following the energy efficiency performance standards set forth in Tier 2 of the 2016 California Green Building Standards Code, Section A4.203.1.2.2. These reductions shall be achieved by employing energy efficient design features and/or solar photovoltaics. Compliance shall be demonstrated using CEC-approved residential energy modeling software.*
- *Multi-family residential buildings of three stories or less constructed within the net SAP area and the PRSP area shall be designed to achieve a 15 percent reduction in energy use compared to a standard 2016 Title 24 code-compliant building. Reductions in energy shall be achieved by following the energy efficiency performance standards set forth in Tier 1 of the 2016 California Green Building Standards Code, Action A4.203.1.2.1. These reductions shall be achieved by employing energy efficient design features and/or solar photovoltaics. Compliance shall be demonstrated using CEC-approved residential modeling software.*
- *Commercial buildings (including multi-family residential structures four stories or higher) shall be designed to achieve a 10 percent or greater reduction in energy use compared to a standard 2016 Title 24 code-compliant building. Reductions in energy shall be achieved through energy efficiency measures consistent with Tier 1 of the 2016 California Green Building Standards Code, Section A5.203.1.2.1. Alternatively, this could be met by installing on-site renewable energy systems that achieve equivalent reductions in building energy use.*
- *All project buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of the 2016 California Green Building Energy Code, Sections A4.106.5 and A5.106.11.2.*

The DEIR states: "Under Appendix G of the State CEQA Guidelines, a project would result in a cumulatively considerable contribution to climate change if it would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Placer County is the CEQA lead agency for the project and is, therefore, responsible for determining whether an impact would be considered significant. At the time of writing this Draft EIR, Placer County does not have an adopted Climate Action Plan consistent with State CEQA Guidelines Section 15185.5(b)".

The DEIR also states: "The Placer County General Plan includes the following policies related to addressing GHG emissions and climate change in Placer County:

Policy G-1: The County shall require that all new dwelling units meet current State requirements for energy efficiency, and encourage developers to exceed Title 24 requirements. Retrofitting of existing units shall be encouraged.

Policy G-3: The County shall continue to implement provisions of the Subdivision Map Act that require subdivisions to be oriented for solar access, to the extent practical."

Our comments

California's 2019 Building Energy Efficiency Standards officially take effect on January 1, 2020. Single-family homes built with the 2019 standards will use about 7 percent less energy due to energy efficiency measures versus those built under the 2016 standards. Once rooftop solar

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electricity generation is factored in, homes built under the 2019 standards will use about 53 percent less energy than those under the 2016 standards. This will reduce greenhouse gas emissions by 700,000 metric tons over three years, equivalent to taking 115,000 fossil fuel cars off the road.

We ask that even if building permits are granted this year, given the climate emergency and the California renewable goals, that these projects be required to meet the 2020 Title 24 Chapter 6 Building Rules of zero net energy for all single residence homes in the project area. We also suggest that non-residential buildings be required meet the 2030 standard of zero net energy, without height limitations. Cool roof should be required in connection with solar panels.

Implementing these suggestions will help reduce the operational GHG emissions (Net SAP Area and PRSP Area) and change the determination from unavoidable to avoidable. The revised County EIR must show the projected greenhouse gas emissions after the required changes are made.

Other policies referred to in the DEIR

The Proposed Sunset Area Plan goals include:

- a) *Policy NR-6.2: Energy Efficient Construction. The County shall encourage new construction to achieve third-party green building certification, such as the GreenPoint Rated program and the LEED rating system. This will include building and capital improvement design practices that reduce energy consumption, maximize energy conservation, promote passive solar energy generation or other on-site electricity generation, and incorporate natural ventilation.*
- b) *Policy NR-6.7: Residential Energy Efficiency. The County shall encourage residential units to be designed to maximize energy efficiency.*

Our comments

We appreciate the use of “shall” rather than “should” but how does one measure the outcome of **encouragement** with respect to energy efficiency, or for that matter, the success of **promoting** passive solar energy generation.

We ask that the policies change the word “encourage” to “require”. “Encourage” does not reflect the urgency to deal with the existential threat of climate change. We also ask that the County include the actual LEED rating system set standards that will indicate whether the Developer has made sufficient effort to actually implement the standards that are actually in use in the building industry. Again, The County EIR must show the projected greenhouse gas emissions after the required changes are made.

Mitigation Measure 4.7-2b: Purchase carbon offsets (Net SAP Area and PRSP Area)

“The County will require project proponents of individual developments under the project to offset operational GHG emissions remaining after implementation of Mitigation Measure 4.7-2a. The net SAP area would generate 373,896 MTCO₂e/year after implementation of Mitigation Measure 4.7-2a. PRSP would generate 195,014 MTCO₂e/year after implementation of Mitigation Measure 4.7- 2a. The total GHG emission offset requirement would be 193,914 MTCO₂e, or 27.14 MTCO₂e/year for each residential unit in the PRSP area.”

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If the buildings including residential and non-residential all comply with zero net energy as required by Title 24 in 2020, then there will be no need for this mitigation.

The DEIR refers to the mpower program. *MPOWER is a local program in Placer County that provides financing to property owners for the installation of energy and water efficiency retrofits and renewable energy systems. Investing in mPOWER is consistent with the County's General Plan Policy 2.G.5, as described above in Section 4.7.3, "Regulatory Setting." Other examples of local direct investments include financing installation of regional electric vehicle-charging stations, paying for electrification of public school buses, and investing in local urban forests.*

There is no reason that the Developer shouldn't be required to make these investments on behalf of property owners as the project is being built. Otherwise, there is no guarantee that the property owner will go forward with the investments.

If zero net energy is implemented, we see no reason why mitigations as called for under 4.7.2b will be required. Electric vehicle-charging stations and bus-electrification must be required as part of the development to offset the vehicle trips from residents of the development.

Other suggestions

Paths - consider using compacted crushed rock for trails. It's cheaper, faster, permeable, and produces less CO2 emissions than concrete.

Ban grass lawns for water conservation leading to less energy use.

No natural gas lighting. LED only with nighttime glare minimized.

Electric car chargers for apartment use.

"smart glass" – electrochromatic windows

Drought resistant trees that do not block solar.

Solar pv in all parking lots.

In addition to our comments, the Alliance for Environmental Leadership will submit an Alternative 6 to the DEIR. This Alternative meets all of the County's Objectives and will be environmentally superior to the proposed Project and the other Alternatives included in the DEIR. We believe that under CEQA that the Citizen Initiated Smart Growth Plan (CISGP), produced by the Alliance for Environmental Leadership, must be fully analyzed as an Alternative.

Thank you for the opportunity to provide comments on the DEIR. We look forward to a thorough response from the County.

Sincerely,

Don Rivenes

Don Rivenes, Conservation Chair

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