



Sierra Nevada Group

Mother Lode Chapter

P.O. Box 1042 Nevada City, California 95959

February 20, 2019

Shirlee Herrington
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 96503
cdraecs@placer.ca.gov

Re: Sunset Area Plan/Placer Ranch Specific Plan Draft Environmental Impact Report

Dear Ms. Herrington:

I write on behalf of the Sierra Nevada Group of the Sierra Club. Though we reside in Nevada County we are concerned about many aspects of the Sunset Area Plan and Placer Ranch Specific Plan DEIR. We do absorb the GHGs, the ozone, the ever-increasing traffic in the region, the loss of open space, vernal pools, wetlands – all significant impacts associated with this very large project.

A primary concern regarding the SAP/PRSP DEIR is its disturbing lack of strategic planning for the future in the face of our rapidly changing climate and its indisputable cause – Green House Gas emissions. The Plan continues with a business-as-usual model of automobile dependency throughout the area with a projected 870,000 daily vehicular trips spewing 575,000 metric tons per year of Green House Gases and virtually no viable public transit. Does the County really expect that this type of planning can be accepted? Granted that an earlier plan (1997) was being used and reworked, but surely someone must have called your attention to its shortcomings even then. We can't keep repeating the mistakes of the past – we must design for the future.

What happened to Smart Growth? Our world is changing in many unexpected ways and Placer County leaders must recognize that continuing to use the model of low density, automobile-dependent housing with the hope that it will match the jobs portion of the SAP is not what is needed to combat the threat we are facing. In fact the industrial/commercial jobs portion of the Plan is in excess of the housing portion creating an imbalance and the specter of more vehicular trips – more GHGs.

A serious flaw is the lack of public transit or futuristic thinking about it. Much of the circulation is dependent on a parkway that isn't built yet and may be subject to delays and changes. Perhaps if there were a re-design, reorganizing the placement of housing, schools and jobs, some innovation could be brought forward, such as rail (there is a nearby track in place) or transit hubs that could accommodate bus transit.

The need for mitigation for so many significant and unavoidable impacts in the current Plan could make it unaffordable for the County and its backers to move forward. Couldn't some of that mitigation money be better used to provide low-income housing and the types of transit that would reduce the climate-changing Green House Gas emissions? And help finance building improvements to make all the new buildings (housing, commercial and industrial) zero net energy – which will be a California requirement in 2020.

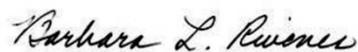
Regardless of how it is paid for, the goal of the Project overall should be to reduce energy needs for homes and businesses and that developers and builders are required to meet those standards and overall goals. Reducing the Project's footprint would go a long way toward lowering its mitigation costs and impacts to the region.

As discussed above, the PRSP/SAP DEIR revealed significant impacts to the environment that cannot be sufficiently mitigated. Because of the Project's numerous and dangerous environmental impacts, the Board of Supervisors should terminate the proposal by approving the "No Project" alternative. Failing that, then the Draft should be recirculated to more completely analyze the impacts. In the recirculation, we ask that an Alternative entitled Citizen-Initiated Smart Growth Plan developed by Alliance for Environmental Leadership (AEL) also be analyzed as an environmentally superior Alternative which actually meets the County's objectives specified in the DEIR.

I believe we as citizens of today have an obligation to citizens of tomorrow to not continue to destroy the world in which they will have to live and work.

Thank you for the opportunity to provide comments.

Sincerely,



Barbara Rivenes, Chair
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