

# LFW

February 22, 2019

Placer County Board of Supervisors  
EJ Ivaldi, Planning Director  
3091 County Center Drive #140  
Auburn, CA 95603

attn: Shirlee Herrington, Environmental Coordinator (email:  
sherring@placer.ca.gov)

Dear Ms. Herrington:

The pages that follow describe the fundamental and basic inadequacy of the Draft Environmental Impact Report for the Sunset Area Plan and the Placer Ranch Specific Plan (Project). I address some, but not all of the inadequacies.

The DEIR needs to be recirculated because it fails to comply with the requirements of CEQA, fails to mitigate for the Project's environmental impacts and fails to consider a Project Alternative that is capable of eliminating the Project's significant impacts.

The County is in the process of preparing an economic/fiscal analysis of the Project. CEQA requires, at a minimum, that the DEIR present all relevant facts regarding the Project's fiscal impacts. To continue processing the DEIR prior to completion of the economic/fiscal analysis is in violation of CEQA, because the economic/fiscal analysis could affect the project description, which could also affect the various analyses of the EIR.

The major concerns that would be addressed in the economic/fiscal impact study and that are critical include:

- Although the County/project proponent has claimed there is sufficient student demand to support a Sacramento State satellite campus, there is observational evidence that this statement may not be valid. The attendance at Sacramento State University has remained stagnant for the past decade and enrollment at Sierra College has dropped. In addition, Internet college degree curricula are becoming increasingly popular and may disrupt traditional college campuses.
- Is there sufficient funding to support the construction and ongoing operational costs of the University? Since the State University system provides minimal funding in support of satellite campuses, this will result in a significant funding obligation for the ultimate developer of the

specific plan and other funding sources. What is the County's potential funding obligation?

- The economic/fiscal analysis needs to verify that the increased employment generation, increased tax revenues, labor income and annual economic output benefits cited by the County to process the Placer Ranch Specific Plan through the development review process are accurate.
- Although the County has a memorandum of understanding with the property owner of the Placer Ranch property, this may not be sufficient to guarantee full repayment to the County plus interest. The economic and fiscal impact study needs to evaluate the long term fiscal costs to the County for funding a specific plan for a private developer, the cost of funds and whether the MOU constitutes a gift of public funds; also, does the MOU protect the County's financial interests should the property be sold?
- The potential for the Project commercial centers to have an economic impact on neighboring communities is not addressed in the DEIR. Such economic impact may include closure of stores and urban decay in existing retail centers leading to physical blight and loss of sales tax revenue to the County and Cities.

**Observations related to the DEIR sections and listed impacts:**

**Section 3.1 Overview:**

**The DEIR overview** fails to describe the very "nature" of this dynamic site in the "Project Description Overview". This omission allows the DEIR to perpetuate a false narrative that limits the public and decision makers' ability to understand how the natural systems in the SAP function. The DEIR overview must be revised to provide a description of the unique soils, edge conditions, hydrology and seasonal functions in order for the public and decision makers to conduct a meaningful review and make conclusions about the Project's impacts.

**1-7 Contribution to substantial light that would adversely affect nighttime views**

While the DEIR concludes that light pollution impacts will be substantial and unavoidable to Aesthetic considerations, it fails to analyze the substantial adverse impact that light pollution will pose to species. The SAP is a part of the Pacific Flyway. Migratory fowl that rely on stars for navigation use vast areas of the SAP for forage and rest. The West Placer prairie also supports the second highest density of migratory raptors. The DEIR fails to analyze how light pollution affects raptor populations - particularly owls - that rely on darkness to locate and secure prey. The DEIR fails to address the impact that light pollution will have on wetland habitats within and adjoining the SIA/PRSP (including the planned PCCP and the four mitigation sites north of the project area and mitigation areas within the

Pleasant Grove Retention Basin) that are home to amphibians, such as frogs and toads, whose nighttime croaking is part of the mating ritual and is stimulated by darkness.

The DEIR fails to address the effect of light pollution on mammalian populations' survival capacity. Most mammals sleep during the day and are active at night. The DEIR must analyze the likely disruption that light pollution will have on their nocturnal activity, hunting capacity and reproductive activity.

The DEIR fails to address the impact of light pollution on human health, including disrupting circadian rhythms, melatonin levels, and generally contributing to sleeping disorders. These issues must be addressed and mitigated and until this is done, the DEIR is incomplete and inadequate.

#### **4.2 -1 Conversion of Farmland to non-agricultural use**

In the County's General Plan, the Project has long been established as a place reserved for industry and agriculture, where suburban sprawl could not transgress. Baited by a promise of a University, the County is abandoning its own best interest and is planning on opening the SA to low density urban sprawl and taking 7,295 acres of farmland with it. The DEIR fails to address how the County's intent to turn its back to the State's agland conservation policies and legislation will affect the County in the future, including what opportunities for State funding the County will forgo.

The DEIR states that farmland may be protected through the approval and implementation of a series of farmland preservation and management plans on a 1:1 ratio - which is actually a net loss and therefore inconsistent with County General Plan policy. Additionally, the fact that the approval and implementation of these farmland preservation and management plans is speculative and that no time frame is established for approval and implementation of these plans makes mitigation measure 4.2-1a inadequate.

4.2.-16 describes a mitigation whereby mitigation lands would be protected by farmland conservation easements. This is not habitat mitigation. Farmland mitigation and habitat mitigation are mutually exclusive. Land used for farming is generally not habitat. Farms can be managed in such a way that migrating birds can use it in the fallow season (flooded rice fields), but farmland does not provide habitat for non-migratory animals. This mitigation should be removed.

DEIR is incomplete because it fails to:

- establish the cumulative impact of agricultural lands conversion in the SAP to CA greenhouse gas reduction goals.
- quantify the tonnage of GHG sequestered annually in the Project area and account for the loss of annual and future GHG sequestration value when

calculating GHG generation. If the project will generate 550,000 metric tons of CO<sub>2</sub> annually, how much CO<sub>2</sub> sequestration is being lost as a result of development.

- quantify the tonnage of GHG to be released from soils during the construction phase of the SIA and PRSP projects
- identify the cumulative loss of greenhouse gas sequestration potential over the 80 year life of the proposed project.
- compare the projected GHG emissions from urban uses proposed in the SAP/PRSP to GHG emissions from agricultural activity (per acre, urban uses contribute 70 times more GHG than active agricultural activity) over the life of the project
- explain how, as project proponent for the conversion of 7,295 acres of agricultural land to urban uses, Placer County's ability to enforce of its own Agricultural Lands Conservation Policy will be impacted.
- consider how the loss of 7,295 acres located in close proximity to an urban center could potentially impact food production, availability and flexibility as impacts of climate change become more severe
- Consider how a projected 8' sea level rise during the 80 yr. Project build-out will affect development potential of low lying farmland.

#### **4.4 Biological Resources**

In the mitigation measures proposed to reduce impacts to biological resources, the DEIR states that the developer will hire a qualified biologist to accomplish specific mitigations. The DEIR does not establish a time frame for mitigation monitoring for specific impacts to biological resources.

The DEIR does not explain how the County will monitor the developer's mitigation compliance for accuracy, completeness or compliance with the DEIR mitigations.

Neither does the DEIR explain how the County will fund mitigation monitoring or establish which County staff will be required to perform the oversight. Because it is likely that a number of separate projects by separate developers will be undertaken simultaneously, the staff requirement and cost to oversee mitigation monitoring may be substantial. The DEIR is incomplete until a process for County oversight of biological resource mitigation protections is established and defined as a mitigation.

**Impacts on SAP Conservation Reserves:** The SAP is home to two watersheds, the Orchard Creek, Auburn Ravine and Coon Creek Watershed and the Pleasant Grove and Curry Creek Watershed. These watersheds' summit runs generally east-west across the SAP and drain to the Sacramento River. Orchard Creek watershed drains north to four major conservation and mitigation banks -the Warm Springs Mitigation Bank (which is omitted from DEIR maps), Moor Ranch Conservancy, Antonio Mountain Ranch and Orchard creek Conservation Bank. These Banks will become part of the Placer County Conservation Plan (PCCP) area - if the PCCP is approved.

The DEIR fails to analyze the impact of the Project on the four biological resources and function. Upstream modification of the sensitive vernal pool habitat that can bring about degraded surface water quality, grading, excavation, accidental spills of hazardous substances, removal of the natural headwaters and the underlying clay pan, removal of a vernal pool complex and drainages that feed the reserves, excavation and topographic leveling, soil compaction and a general change to runoff patterns must be evaluated and mitigated in the DEIR.

#### **4.4-6 Loss or degradation of riparian habitat**

The DEIR states that no special status fish species are known or expected to occur in the project area. This is false. Recent Fish and Wildlife studies observed that juvenile winter and spring run salmon move into and use lower Auburn Ravine and Pleasant Grove Creeks (due to its warmer temperature and abundant food supply which may lead to higher growth rates and conceivably better survival of salmon).

The DEIR describes the significant effect of channelization and weir installation along of 3900 feet of Pleasant Grove Creek and the installation of control structures and the removal of all riparian vegetation and the habitat values provided herein in connection with the Pleasant Grove Retention Facility. It does not however, analyze the effect of disruption of Pleasant Grove Creek on fisheries. This activity will potentially have a significant impact on the juvenile salmon and on migratory salmon, steelhead and resident trout. The streams that will be impacted with the SAP are essential to the recovery of severely diminished winter and spring run Chinook salmon as well as sustain numerous resident trout that can transform into migratory steelhead. Numerous community organizations monitor and work actively at restoration of Western Placer streams. Ensuring adequate water flow and water quality as well as gaining year-round fish passage to and from the Sacramento River are essential to stabilizing population. With major alterations proposed to system water conveyance, governance, storage, in stream flows, mitigation requirements and fishery management, it is critical that the DEIR address potential impacts on fisheries so that populations are protected and monitoring systems are in place. The DEIR fails to provide a full analysis of impact to threatened and endangered fish species, nor does it propose adequate mitigation necessary to ensure survival of salmon, steelhead and trout populations.

Pleasant Grove Creek Channelization: The DEIR fails to analyze how channelization of 3900 feet of Pleasant Grove Creek and the removal of associated riparian forest will impact fisheries.

#### **4.4-5 Disturbance or loss of special status species**

The DEIR fails to survey for threatened or endangered insect species or consider how the removal of West Placer prairie will affect insect populations regionally and impact the function of the PCCP, Warm Springs Mitigation Bank (which is omitted from DEIR maps), Moor Ranch Conservancy, Antonio Mountain Ranch and Orchard

creek Conservation Bank and mitigation habitat in the Pleasant Grove Retention Basin.

Insects are in a perilous condition according to a new global scientific review, with more than 40% of insect species threatened with extinction, while the mass of insects is declining at 2.5% a year. This catastrophic decline is an existential threat to other animals, since insects are at the bottom of the food chain and the primary food source. Habitat loss is a key driver toward this mass extinction.

The DEIR fails to analyze how the cumulative loss of pollinator habitat will impact regional farm production and food supply.

#### **4.4-5 Monitoring Disturbance of Special Status reptile, bird, mammal and fish species**

The mitigation measures proposed for special status species are inadequate. The mitigation states that if species are found during a survey or observed within the construction site, a qualified biologist shall relocate them to the nearest area with suitable habitat.

If a pond turtle, for example, is found to occupy a pond in the nesting season, the DEIR calls for a qualified biologist to relocate it to an alternative suitable habitat. The DEIR provides no protections for eggs that the Western Pond Turtle may have laid. As Western Pond Turtle eggs are buried, the DEIR should mitigate impacts to these eggs by stating that no construction activity will take place at sites providing habitat suitable to Western Pond Turtles during nesting season and the period that eggs are incubating and hatching.

#### **4.4-8 Interfere substantially with wildlife movement**

I applaud the DEIR for the mitigation 4.4-8a to create wildlife crossings for safe wildlife passage over and under the Placer Parkway. (The DEIR fails to provide similar protection for human population movement over and under the Placer Parkway)

#### **4.7 Greenhouse Gas Emissions**

##### **Trucks v Automobiles**

The DEIR fails to establish how many of the VMT will be by heavy trucks and distinguish the total GHG emission from trucks v automobiles. Because the SAP is an industrial, manufacturing and warehousing Project and will also create two regionally serving retail centers, accounting for the the number of heavy truck trips servicing and delivering and moving cargo out of the Project site is relevant to the analysis. Additionally, the DEIR fails to address the GHG impact of truck engines, which are left idling for hours of time, nor how prevailing winds will distribute this static pollution source. The DEIR fails to consider how concentration of a major

manufacturing and industrial center near to schools and single-family residential uses will affect the health and welfare of these sensitive populations. The DEIR must analyze how proximity to heavy truck traffic will affect the safety and health of pedestrian and bicyclist who will share the roadways.

### **Heat Islands**

The DEIR fails to analyze the heat island effect that will be created with development of the Project. The heat island effect affects communities by increasing summertime peak energy demand, air-conditioning costs, air pollution and greenhouse gas emissions, heat-related illness and mortality and water quality. Air temperature caused by roof and pavement surfaces warmed on a summer's day can be as much as 22 degrees warmer than the air in neighboring, less developed regions. At build out, the SAP will be 83% parking lots and roadways and 17% structures.

To combat heat island effects, the US EPA has developed specific mitigation measures, which the DEIR fails to consider.

Prevailing winds from the west in the summertime will move the atmospheric heat island across the landscape and into neighboring communities and the Sierra Nevada. The DEIR fails to analyze the impact of this phenomenon on neighboring communities and on flora and fauna in Sierra wildlands and how the atmospheric heat island will contribute to wildfire and tree mortality.

## **4.12 Population and Housing**

### **The County General Plan**

State law requires each community in California to provide its "fair share" of the region's housing needs through its housing element. The DEIR 4.12.2 states that between 2013 and 2021, SACOG, which is responsible for allocating the "fair share" calls upon Placer County to provide 5,031 units available to very low, low, moderate and above moderate income levels. The DEIR is inadequate because it does not indicate to what extent Placer County has achieved its "fair share". This is important because the growth area of SAP represents perhaps the best opportunity to achieve affordable housing. With the limited information available in the DEIR, it is not possible for citizens or decision makers to determine if the SAP/PRSP is moving the County toward achievement of the "fair share".

The market analysis prepared for the SAP found that a jobs housing ratio of one home to five jobs is ideal. The SACOG Blueprint calls for a 2:1 jobs housing ratio. The concept of balance is based on the assumption that if a community provides housing proportionate to the number of jobs in the community, the majority of residents would have the opportunity to work and reside in the same community. The SAP/PRSP has a 22:1 jobs housing imbalance. The DEIR fails to analyze if the 22:1 jobs housing imbalance will put upward price-pressure on all housing types - but most particularly workforce housing. The DEIR fails to adequately address the impact of this imbalance on VMT and GHG. The DEIR fails to provide decision

makers and the public information necessary to determine what income groups will be most adversely impacted by the jobs/housing imbalance.

The proposed Sunset Area Plan Policy: LU/ED-4.5 encourages “the development of workforce housing to accommodate local employees, particularly housing affordable to service industry workers”. Service industry workers will, in fact, constitute the majority of the 57,000 new jobs to be created in the SAP/PRSP. The DEIR fails to describe to what extent the housing needs of this population will be met in the SAP/PRSP.

Contrary to the County’s own proposed Workforce Policy, in the SAP, workforce housing is permitted only by special use permit and limited to 2,500 units. The DEIR fails to analyze how the special permit status may, in itself, discourage workforce housing construction.

There are three school districts proximate to the PRSP. The DEIR fails to establish that these school districts will provide a “will-serve letter” to operate elementary and middle schools (and a University) within the one mile buffer of the MRF.

#### **4.13-4 Increased demand for library services**

The DEIR acknowledges the need for library services but fails to establish a mechanism to guarantee that one is built. The land use map for the Project designates no site for a library nor does it set up a funding mechanism for library construction and operation. The DEIR mitigates the recognized demand for library services through a mechanism called a landowner-approved special tax. This mitigation is inadequate because the library tax is discretionary and subject to developer initiative. Instead of mitigating this significant impact with a developer-initiated tax, the mitigation should impose fees upon the developer and establish a funded plan to build a library. The proposed mitigation is inadequate.

#### **4.14.4 Bicycle and Pedestrian System as Factor in reducing VMT**

Bicycle and pedestrian routes are proposed to be established alongside major traffic arteries throughout the SAP. The DEIR fails to analyze how heavy truck traffic from the industrial uses proposed in the SAP/PRSP will impact the health and safety of bicyclists and pedestrians who may utilize these routes. Cities and Counties are increasingly providing dedicated lanes for pedestrians and bicyclists, separated from traffic with curbs and planting strips. The DEIR fails to analyze how dedicated and separated bicycle and pedestrian paths could reduce VMT on major thoroughfares including Placer Parkway, Sunset Blvd., Campus Park Blvd., Fiddymment Road and University Village Dr.

Additionally, the DEIR provides no analysis of how pedestrians and bicyclists will safely cross Placer Parkway, Sunset Blvd., Campus Park Blvd., Fiddymment Road and University Village Drive. A provision for pedestrian overcrossing and/or under crossings should be analyzed.

#### **4.14.13 Impacts to transit**

In 4.14.13, the DEIR established that demand for public transit will have a significant impact on the Project. Yet, in the 14.9 sq. mi. SAP, only one bus route is proposed, despite the stated Policy Goal TM-1 “The County will develop a balanced multi-modal transportation network in the SAP”. The DEIR is inadequate because it relies on a future Placer County Transportation Agency Plan to address the significant demand for transit and because of the SAP’s failure to provide comprehensive transit access based on proposed land uses and as a mitigation for significant impacts.

The DEIR is inadequate because none of the project Alternatives are smart-growth that might support a vigorous bus system supported by higher density development.

4.14-16-20 The DEIR is inadequate because all mitigation for level of service impacts call for increased capacity. The DEIR fails to consider the Institute of Transportation Studies, University of California, Davis report on Roadway Capacity and Traffic Congestion. In that Study, an increase in roadway capacity actually led to increases in VMT. The study found that when roadway capacity increases, it decreases travel time causing the quantity of driving to go up. So, the effectiveness of capacity expansion described in the DEIR as a strategy/mitigation for alleviating traffic congestion, will not actually relieve traffic congestion caused by the Project, it will increase it; and therefore the DEIR is inadequate.

#### **4.15.13 Utilities**

The DEIR fails to address the role of Pioneer Electric in the provision of electrical services to the SAP/PRSP. Pioneer Energy is listed in Table 4.15, but no further discussion of Pioneer Energy is included in the DEIR. It has come to my attention that counties discount and even offer free energy to attract developers and tenants.

The DEIR fails to establish if Pioneer Energy’s policies and procedures adequately protect citizen ratepayers from subsidizing future occupants of the SAP/PRSP. This is a concern because of the potential fiscal impact on Pioneer ratepayers communitywide.

#### **4.15-11 The potential impact on the Western Regional Regional Landfill from incompatible land use that results in insufficient permitted capacity to serve disposal.**

The DEIR states public complaints about the MRF odors and the MRF’s ability to expand are less than significant, based on a conclusion that other Material Recovery Facilities have expanded despite odor complaints. This is an inadequate response because not only is the County building a new community within the one mile buffer, it is proposing to reduce the buffer to as little as 500 feet. Nowhere in the DEIR is there a discussion of public complaints correlated to distance from the odor source. So, to simply say that other facilities have expanded despite public complaint is meaningless without context, unrealistic, subjective and inadequate.

Further, the DEIR fails to address the County's own legal action to protect the MRF buffer in 1997 because its own concerns about expansion capability and the precarious legal precedent this earlier litigation sets.

## **2.6 Issues to be resolved**

**Cumulative List:** The DEIR is incomplete because it does not provide a composite list of all fees and assessments and special districts connected with development of any parcel in the SAP/PRSP. The absence of this composite list leaves decision makers and the public with insufficient information to make an informed decision about project impacts. Only through disclosure of all of the fees, special districts, special taxes and assessments proposed DEIR as mitigation are developers, decision makers and the public positioned to meaningfully review and make conclusions about the Project's impacts.

Another benefit of a comprehensive list of all fees, assessments and special districts is that it will allow the public to monitor the Project to ensure that fees and assessments are adequate and fairly and consistently applied to developers.

**Fiscal Responsibility:** The County is in the process of preparing an economic/fiscal analysis of the SAP/PRSP. The DEIR is inadequate because it neglects to present all relevant facts relating to the Project's fiscal impact. In the absence of this analysis, citizens and decision makers have insufficient information to establish the feasibility of revenue sources, which is a CEQA minimum requirement.

Major Fiscal Concerns Include:

- PCCP fees for development of the 300 acre University parcel will exceed \$40,000,000, which is twice the value of the land, raising concerns that the University is infeasible. Because it is the anchor of the Project, this may affect various analyses and minimum requirements for Project feasibility overall.
- Pleasant Grove Retention Basin. This project has an anticipated cost of \$28,000,000-\$39,000,000. Only a cursory and superficial discussion of the project is included in the DEIR and no analysis is provided about how project funding would be accomplished against the SAP's vague and fluctuating build out projections.
- County's proposal to largely rely on a carbon offset program to mitigate the Project's anticipated annual GHG emissions. The cost of the offset program is not specified nor is there evidence provided that the offset program would be enforceable let alone effective. Currently the Project's operational GHG emissions would require offsets costing between \$370 million and \$1.6 billion.
- Project Objective describes the County's intent "to generate revenue to fund countywide services" through project implementation. New development generally generates only \$.04-\$.64 revenue per dollar cost towards the cost to provide public goods and services. The DEIR fails to provide decision makers and the public an adequate picture of revenue generation from the

Project over the 10, 20, 40 year build out projections or an analysis of the extent to which revenues from the general community will subsidize the project over the 80 year plan.

These are not trivial defects. The DEIR must be revised to identify accurate, reasonable and realistic fiscal impacts and costs and the impacts to County financial stability that will occur throughout this entire development process.

**Economics of Natural Ecosystems:** The DEIR is inadequate because it fails to measure, and therefore does not effectively evaluate, the benefits of ecosystem services received from the natural environment. The totality of ecosystem services and the organisms that provide them is called natural capital. Investing in natural capital and coming up with a measure of the economic value that its health and viability gives us, is an economic measure that the DEIR must consider when determining an environmental impact and whether the benefits of Project development exceed environmental benefit received from the natural environment.

Google's Earth Engine is a source of data on the value of these ecosystem services, as is Stanford University's InVEST (the integrated Valuation of Ecosystem Services and Trade-offs). These sources put a monetary value on the benefits of farmland carbon sequestration and other natural capital and offer data to allow comparison of level-field comparison of the value of habitat as compared to the businesses/development investment focused model.

Decision makers need to understand the value of ecosystem services because this is the whole picture and a way for citizens and decision makers to analyze whether or not the Project should proceed. It is the role of the EIR to explain that ecosystem services are received at no cost and yet they do have a monetary value, which is a generally understood point of reference. Additionally, the DEIR is responsible for explaining that ecosystem services benefit the whole community whereas the benefits of the Project accrue to a few. The community welfare (sequestered carbon) is reduced for a promise of future investment capital, which will not be shared across the community as equally as the farmland values were.

The DEIR's failure to monetize the value of natural systems does not give the public and decision makers all the information necessary to understand, in a holistic way, the impact of the Project. Failure to monetize environmental values also erases the value these natural systems contribute to our quality of life. It is not a one snap shot valuation, because natural systems continue to benefit the community and add community value in perpetuity.

When an environmental service, such as farmland, is lost, the economic analysis of what will replace the farmland should consider the value of the loss of future carbon sequestration and cost of the release of a lifetime of stored carbon, the human value of enjoyment of open space and the value accruing to the web of life, of which we are a part. These are quantifiable values.

## **Conclusion:**

In circumstances like this, when all available and feasible mitigation measures have been identified, but are inadequate to reduce an environmental impact to a less-than-significant level, CEQA states that the County may not simply proceed with a finding of overriding consideration. First, the County must determine that all feasible mitigation to substantially lessen the significant effects of the Project have been analyzed.

To that end, the Alliance for Environmental Leadership put forward the Citizen Initiated Smart Growth Plan (CISGP), which we believe substantially reduces significant environmental impacts and is environmentally superior and therefore, the County is obligated to analyze the CISGP as a Project alternative.

The Citizen Initiated Smart Growth Plan achieves County Goal and objectives as set forth in the DEIR. It provides comparable business and industrial opportunity to the proposed Project through a spectrum of industrial mixed-uses that locate residences adjacent to the highest employment density in such a way that fosters community synergy. The CISGP is designed as an innovation ecosystem -providing 49,613 multi-family housing units of various typologies designed so that businesses, students and 145,000 workers are living and working in proximity for the purpose of collaboration and meeting high quality of life measures. The CISGP produces a jobs housing ratio of 3:1, as compared to the 22:1 Project jobs housing balance. In addition, a higher density of housing dramatically reduces environmental impact per capita, makes rapid bus transit possible and reduces GHG emissions by 75%. The CISGP moves the University outside of the one mile MRF smell "buffer", to an infill site where project feasibility improves, infrastructure is in place to support University development and where students will readily engage with businesses and contribute meaningfully to the innovation ecosystem. In summary, the CISGP should be analyzed as a Project alternative because it is an opportunity for Placer County to establish a future forward innovation community and achieve the objectives identified in the County's DEIR without significant adverse environmental effect.

I urge you to recirculate this DEIR, because the Proposed project lacks a revenue source and would result in severe environmental degradation. Recirculation would ensure that decision makers and the public are given the opportunity to analyze the environmentally superior CISGP. Our common goal is a thriving SA, regional benefit and generating revenue to fund countywide services.

Please insure that public comments appear verbatim in the DEIR. Thank you for the opportunity to provide comments on the DEIR, for your consideration of my request that the DEIR be recirculated and for your consideration of the CISGP.

Sincerely,

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