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February 9, 2019

To: AEL Community and Colleagues

FR: Leslie Warren, Chair, Alliance for Environmental Leadership

RE: Comparing CISGP and SAP/PRSP

Many of you have requested a comparison of the CISGP and the County's SAP/PRSP. As the proposed transformation of a natural ecosystem to a new industrial city is so complex, only a partial comparison is provided here. I refer you to pages 46-78 of the CISGP which attached hereto for a comprehensive set of comparison tables of natural resources and agricultural systems.

## Comparing AEL's CISGP and Placer County's SAP/PRSP

### **Job Center Concept versus Innovation Ecosystem Comparison**

Placer County's proposed Sunset Area Plan/Placer Ranch Specific Plan will remove 13.9 square miles of farmland, vernal pool wetland, the headwaters of two watersheds and their associated riparian forest and replace this natural prairie ecosystem with a) a 39 million sq. ft. industrial/retail complex, b) primarily single-family low-density residential sprawl and c) a 33,000 student university and 4,000 units of university housing. While the County states an objective to create a collaborative environment within the SAP/PRSP, they fail to do so because the County looks at three unique blocks of ownership and designs accordingly - even to the point of using major roadways to segregate.

The CISGP provides comparable business and industrial opportunity through a spectrum of industrial mixed-uses that locate residences adjacent to the highest



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employment density in such a way that fosters community. Because the County has maintained a decades-long vision to bring a jobs center to the West Placer prairie and because a jobs center is part of the SACOG Blueprint for growth, the Alliance for Environmental Leadership's Citizen-Initiated Smart Growth Plan (CISGP) does not oppose the job center concept; but instead, enhances it with science supported design.

### **Buffer Zone and Economic Feasibility Comparison**

Under the County's SAP/PRSP, low-density single-family housing, the university and its associated housing, a middle school, and an elementary school are proposed to be developed south of a new expressway Placer Parkway, within the one mile "buffer" smell zone associated with the County's dump - aka Materials Recovery Facility (MRF). The entirety of Placer Ranch is a vernal pool ecosystem of 2,000 acres. In the 1990's the County successfully litigated against a developer to protect the "buffer". Now the County is the *project applicant* to reduce the "buffer" to 500 ft. and allow some of the most sensitive population groups to live within it. The CISGP removes housing and schools from the MRF smell "buffer", and only large scale industrial campus will be permitted, in large part because the mitigation fees to the proposed Placer County Conservation Plan are so high, that any other use is economically infeasible. For a point of reference, the PRSP's proposed State University campus in the smell "buffer" would generate \$40 million in mitigation fees through the PCCP- more than twice the property value of the 300-acre site.

The CISGP moves the University to an infill site away from the smell zone and off the vernal pool wetlands, where project feasibility improves, infrastructure is in place and the University will contribute to the day to day life of the innovation ecosystem.

### **Air Pollution and Greenhouse Gasses Comparison**

With the County's SIA/PRSP, at build-out at minimum density, up to 83% of the 9,600 acre site will be parking lots and roads and 18% will structures, according to the average FAR. The proposed public transit consists of a bus stop map that does not have the ridership density to support useful bus service. As a result, public



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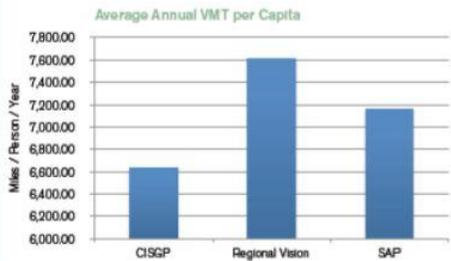
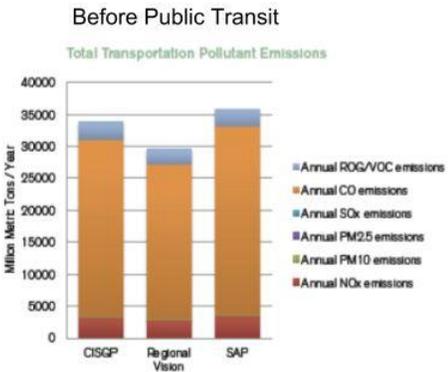
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transit will not be utilized by the proposed 100,000 - 150,000 people who would live and/or work in the project area at build-out. With a car dependent population, new daily vehicular trips will exceed 880,000. Annual CO2 generation will exceed 550,000 metric tons.

The CiSGP enables rapid bus public transit by increasing residential densities and improves quality of life and character of place. The CISGP addresses social equity through quality location of all housing. The proximity of workforce housing and daily amenities to employment in the CISGP will reduce household operating costs by \$3,000 annually compared with the County's SAP/PRSP. See the Household Cost Report on page 53 of the CISGP for details.

*Transit Feasibility*

	CISGP	SAP
% of Residents living in minimum required density of 9 du/ac to support Bus Rapid Transit	100%	12%
% of Non-Residential Uses with the minimum FAR of 1.0 required to support Bus Rapid Transit	45%	0%



**Social Equity and Housing Comparison**

Tax payers of all income levels have funded the upfront planning work (to date \$6. million) for the County/developers' design, but not all citizens will reap benefits should this project proceed. While most of the estimated 92,000 new jobs



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will be occupied by blue-collar, hourly-wage workers, only 600 units of high-density multi-family housing are proposed among the 8,014 total units of which 6,291 are single family sprawl. The SAP Jobs-housing ratio is 22:1.

The CISGP is designed as an innovation ecosystem -providing 49,613 multi-family housing units of various typologies designed so that businesses, students and workers are living and working in proximity for collaboration and quality of life measures. This produces a Jobs housing ratio of 3:1. SACOG's job housing standard is 2:1.

In addition, a higher density of housing dramatically reduces environmental impact per capita:

### *Annual GHG Emissions per Household*

<b>CISGP</b>	<b>14 metric tons</b>
SAP	49 metric tons
USA Ave.	52 metric tons



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### *Percent of Residents in Walking Distance to Amenities*

	<b>CISGP</b>	<b>SAP</b>
Park, 10 min.	100%	72%
Schools, 15 min.	89%	17%
Hospitals, 15 min.	89%	23%
Restaurants, 10 min.	100%	30%
Work, 15 min.	100%	9%
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Homes within 15 min. of job site	100%	9%
Job sites within 15 min. of a home	61%	38%

### **Natural Systems Comparison**

Perhaps most importantly, the County's SAP/PRSP is driven by blocks of property ownership boundaries rather than the dynamic and complex natural features of the land. CISGP design protects and enhances the prairie's natural features and systems where possible through a balance of local and regional conservation. Wildlife corridors, hydrologic dynamics, vernal pool, and agricultural features will all but disappear with the County's SAP/PRSP. Additionally the County's Plan poses a threat to ecosystem values in the four major conservation/mitigation sites located outside but proximate (north) to the SAP - because the headwaters and most of the watershed of these existing conservation properties will be eliminated under the SAP/PRSP and development will increase the edge effect on the reserves. See pages 68-78 of the CISGP for detailed natural system comparisons.