

Shirlee Herrington

From: Cheryl Berkema <cheryl.berkema@gmail.com>
Sent: Monday, February 18, 2019 2:26 PM
To: Shirlee Herrington
Cc: Cheryl Berkema
Subject: Sunset Area Plan Feb 14 Hearing Comments

Hi Shirlee,

Enclosing the comments that I read in person at the Placer County Hearing Feb 14, 2014. Please add these to the administrative record.

February 14, 2019

Placer County Planning Commission
3091 County Center Drive #140
Auburn, CA 95603
Subject: Sunset Area Plan hearing
Attn: Shirlee Herrington, Environmental Coordinator (sherring@placer.ca.gov)

Placer County Planning Commission:

In December 2018, several concerned citizens made public and written requests of Placer Planning that the many significant projects being introduced by Planning be rescheduled and staggered appropriately to allow adequate time for public review. Time extensions were also requested for the projects due to the excessive document sizes, which were far beyond CEQA guidelines for documents, many of these projects were thousands of pages in length. In addition, several major hearings were also scheduled within the same timeframe completely inundating the public. The Sunset Area Plan, the largest regional project known to Placer County was introduced during this onslaught of document dumping, again, completely overwhelming the public. The Sunset Area Plan is a project a decade in the making. The Sunset Area Plan document was so large that the County had to get a waiver from the State Clearinghouse to divide it into multiple pieces as there is a 300-page limit for documents. Additionally, The Sunset DEIR review period was also during a federal shutdown prohibiting inquiries on housing, transportation, federal environment issues, and for the Placer County Conservation Program.

CEQA's purpose is to (1) inform governmental decision-makers and the public about potentially significant environmental effects of proposed projects, (2) identify ways that environmental damage can be avoided or significantly reduced, (3) prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures, and (4) disclose to the public the reasons why a governmental agency approved the project if significant environmental effects are involved. Why is Placer Planning putting up roadblocks for residents to adequately review and provide informed comments on a project of such importance as CEQA requires?

The Sunset Industrial Area Plan previously proposed by Placer County a decade ago made great promises, however the project objectives were never realized. The Sunset Industrial Area Plan was shown to not be economically feasible. That huge associated project price tag to present the project was picked up by Placer County residents. Placer County is introducing a similar proposal and expecting different results. How and when do we expect Placer County to be paid back for these expenditures from developers?

The Sunset Area Plan is a Hodge podge of disjoint components assembled together largely to create a tax revenue base for Placer County and to benefit wealthy developers. The Sunset Area Plan is reminiscent of the urban sprawl projects of the 20th century, not a forward-looking project that has citizen's and environmental needs of the 21st century at the forefront.

The Sunset Area Plan as proposed is deficient in the following areas:

- No developers have committed to the Sunset Area plan putting the county (and taxpayers) at significant risk. The County being the applicant and approver is a conflict of interest.
- The County has failed to show that the project is economically feasible.
- No innovators were mentioned in the DEIR. Stating you are creating an innovation center does not mean they will come.
- No University has committed to the Sunset Area Plan. Conversely, universities have backed out of the plan. This presents significant risk to the project financials and does not meet the project objectives.
- Would destroy significant vernal pools, habitats, and endangered species.
- Will create a new affordable housing crisis. Hourly workers will not be able to afford housing in the Sunset area. Not only does this compound the housing crisis, it increases the vehicle miles traveled, as workers will need to travel to work in the Sunset Area.
- Will not create the jobs that are projected. The County has failed to show where these jobs are expected to come from.
- Will create close to a million daily vehicle trips a day. This also fails to meet project objectives.
- Is not energy efficient, will produce excessive greenhouse gas emissions, The Sunset Area Plan does not provide alternative sources of energy.
- CEQA does not allow the promise of future action associated with mitigation measures that are currently not feasible because the Placer County Conservation Program (PCCP) has not been adopted. Current laws should be referenced as mitigation measures.
- A huge number of significant impact mitigations are not funded, so cannot be viewed as feasible nor valid.

A project of this magnitude requires much more than a workshop, a public hearing and an article in the Sacramento Bee. Citizens should seriously question the urgency for pushing this project through and the lack of public outreach that the County has provided to the Sunset Area Plan. Placer County has already spent millions of tax payer dollars on implementing sections of the Sunset Area Plan- a plan that has not been approved or reviewed by the public. The Sunset Area plan, a project of regional significance has not been socialized with Placer residents.

I request that you consider the process that has been used to deliver the Sunset Area Plan as insufficient and recirculate the Sunset Area Plan DEIR with the Citizens Initiated Smart Growth Plan as an alternative on the Draft EIR with the minimum 2019 CEQA 120-day review period to allow full

and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan. This Plan is environmentally superior to the proposed project and meets County objectives as set forth in the Draft EIR.

You the Placer County Planning Commissioners have the opportunity to create something special for Placer County. A world class master planner that has designed for some of the most innovative companies in the world has created a vision for an ecosystem that can resonate with citizens, be less impactful on the environment and set example for projects to follow. This is a gift to Placer County. I hope you recognize the opportunity.

It was disappointing to hear Placer Planning claim during the presentation that the Significant and Unavoidable impacts were out of their jurisdiction and control. For the ~45 pages of DEIR impacts, CEQA and NEPA require responses to these impacts and analysis, to fail to do so would be in violation of State and Federal law.

Thank you for the opportunity to provide comments on the DEIR and process.
Sincerely,

Cheryl Berkema