

Shirlee Herrington

From: Cheryl Berkema <cheryl.berkema@gmail.com>
Sent: Friday, February 22, 2019 4:58 PM
To: Shirlee Herrington
Cc: Cheryl Berkema
Subject: Sunset Area Plan DEIR feedback

February 22, 2019

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

Placer County Planning,

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. The Sunset DEIR was not posted on the Placer EIR website until late January. The Placer County website upgrade broke Sunset Area Document links the final week of public review. 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 repayment of the millions of dollars that the County has invested?

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 (so far unnamed, apparently not willing to commit to the project). This lack of developer commitment puts the County at great risk. 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, neither in the short term 20-year time frame nor in the longer 80 year projected project buildout.
- No innovators were mentioned in the DEIR. Stating you are creating an innovation center does not mean they will come. The lack of innovators in the EIR is a significant impact to the economic feasibility of the project. The expected revenue from the innovation area of the project should be detailed in the EIR. This is a risk to the project. A major benefit stated in the EIR is the ability for University students to intern with the innovation area of the project.
- No University has committed to the Sunset Area Plan. Conversely, universities have backed out of the plan, showing lack of participation and commitment to the project. As the University is described to play an important part of the project both in terms of importance to the community and for jobs it would create, this is a significant impact. The project should not be approved without a committed University. This presents significant risk to the project financials and does not meet the project objectives.
- Would destroy significant vernal pools, habitats, and endangered species. species that are "fully protected" under the Fish and Game Code cannot be taken and moved as part of a mitigation plan. *Center for Biological Diversity v. California Department of Fish and Wildlife (2015) 62 Cal.4th 204* .
- 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. GHG emissions create health hazards see *California Supreme Court in Sierra Club v. County of Fresno (S219783)*
- 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. This needs to be addressed in the EIR
- The no build alternative was more impactful to the environment. This needs to be explained in the EIR in great detail.

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. When and how will taxpayers be repaid for these expenses since the County is acting as applicant for the project. One of the main objectives of the DEIR is to provide permanent conservation for the environment and endangered species yet the project is destroying the farmlands, riparian areas, and vernal pools. The conservation for the proposed mitigation lasts for only 50 years. The calculations for why the County states they are meeting this goal needs to be revisited either removing the reason that the project is considered as meeting the objective or making the conservation permanent.

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 2019 CEQA 120-day review period as a minimum 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.

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

Cheryl Berkema