

February 21, 2019

Placer County Planning Commissioner,

Please accept my comments as part of the administrative record for the Sunset Industrial Area Specific Plan. I will preface my comments by stating that the extent of the project and the massive quantity of information presented to the public have far exceeded CEQA guidelines of 100 pages for a small project to 300 pages for a complex project. The number of documents being ‘dumped’ on the public within a short period of time, all exceeding 1000 pages with appendices, is in direct contradiction to the purpose of CEQA which is to inform the public of significant impacts so that they may appropriately comment and participate in the development process.

The Specific Plan sets forth a plan for development of the Sunset Industrial Area which is located outside the borders of Lincoln, Roseville and Rocklin. The project will utilize major arterial corridors including Highway 65, 80 and State Route 99. Because of the proximity of the proposed development to these residential and commercial centers, I am concerned about the cumulative impacts the development will have upon these established areas. Of particular concern is the Project's resulting increases in vehicular use and traffic. The traffic issues have two components - (1) level of service impacts to specific roadway sections; and (2) increases in vehicle miles travelled and daily vehicle trip, which in turn have impacts on air and water quality from added vehicular trips and impervious surface. The DEIR has not adequately analyzed or identified mitigation measure for these impacts. In addition, the DEIR's inadequate analysis of greenhouse gas emissions cumulative with these other established centers is an issue of statewide importance.

The DEIR has failed to address the cumulative impacts and ability to meet project required Levels of Service cumulatively with areas which have been identified as having no funding to mitigate to a less than significant level. As such, with no funding in the foreseeable future to remedy the traffic issues, the analysis must include their traffic numbers along with the proposed traffic increases as a result of the SIA development. The DEIR did not consider the impacts associated with this increase in vehicular use in Lincoln, Roseville and Rocklin. Placer County should analyze these impacts to determine that they can be mitigated to a less than significant level. Traffic impacts do not stop at borders of jurisdiction and the roadblocks being created due to lack of available funding in these adjacent cities must be evaluated to determine that Traffic requirements can be met **within** the project.

The CEQA Guidelines are clear that "[t]he DEIR demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context." (Cal. Code Regs., tit. 14, § 15125(c).) Here, the DEIR does not include an analysis of the impacts that will be associated with the Project's increase in vehicular use within the adjacent areas and is, therefore, inadequate.

The project claims of generating adequate business draw and employment opportunities have been inadequately defined. Statements of fact need to be substantiated with evidence. Since a developer has not been identified, the Regional University Plan does not have signed a contract to maintain and operate an additional campus along with the withdrawal of Warwick, and lack of identity, the DEIR needs to address with quantifiable evidence that the project is economically feasible since it was previously rejected in the 2007-time frame by the City of Roseville. Assertions are speculative.

The DEIR fails to quantify within the Environmentally Superior Alternative section, “HOW” the No-Project Alternative “**would result in a more severe significant biological impact associated with the loss of vernal pool habitat**”. Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to the region and would be affected by the project. The DEIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context. Loss of vernal pools, farmland, etc have not been adequately described or evaluated.

The DEIR does not address Affordable housing needs adequately and needs to further clarify affordable housing goals since California has deemed availability of affordable housing to be a Statewide priority. Further explanation of how this project will meet State targets needs to be expanded.

An alternative created by the residents of Placer County, the Citizen’s Initiated Smart Growth Plan (CISGP) should be included as a viable alternative since it achieves the same goals and objectives of the Sunset Area Industrial Specific plan with fewer impacts.

Respectfully
Larissa Berry