



February 20, 2019

Crystal Jacobsen
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603

Re: Comment Letter Sunset Area Plan/Placer Ranch Specific Plan SCH No. 2016112012

Dear Ms. Jacobsen:

Please accept the City of Lincoln's comments on the DEIR for the Sunset Area/Placer Ranch project. The City's concerns with the project and the environmental analysis rest primarily with the potential cost to solid waste ratepayers due to residential encroachment within the current 1-mile landfill buffer. The City is also concerned about service impacts on the City of Lincoln by creating a new, urbanized, unincorporated area in South Placer.

Landfill Encroachment - With regard to the Placer Ranch component of the project, the City of Lincoln is supportive of a Sacramento State University satellite campus. We recognize that incentives and concessions may be necessary to secure this important regional asset. However, the landfill is another important regional asset that must be protected. This ratepayer asset is shared throughout the county. We are concerned about reduction in the landfill setback, the lack of quantified analysis, and the lack of appropriate mitigations identified in the EIR. We are concerned that the countywide ratepayers will be subject to unanticipated costs to fight litigation, as well as fund future design and construction of odor elimination improvements that have not been fully identified or discussed in the EIR.

The only analysis in the EIR is a comparison of other landfills, their setbacks, a complaint analysis based on existing development, and suggestion of mitigations used by other landfills, such as misters that might be required based on future complaints. There is no quantified analysis that supports reducing the setback over 80% from 5,280 feet for residential development to as close to 1,000 feet in some instances.

The EIR should identify all improvements that can reduce odor such as enclosing the composting operation and providing an air filtration system, and include engineer cost estimates to implement all identified improvements. The delta between the current landfill CIP and expansion budgets and the cost to implement various unanticipated odor control improvements should be identified. The County should then set up a mechanism to fund those improvements from those who are benefiting from the encroachment. The mitigation does discuss disclosures, but the County should also consider more restrictive legal instruments similar to aviation easements for airports.

Fiscal Impact Analysis and Revenue Sharing - On October 16, 2016 the Cities of Lincoln, Rocklin and Roseville collectively requested that when the County considered processing a General Plan Amendment for the Sunset/Placer Ranch area that there be agreed upon approach to addressing the fiscal impacts to the surrounding incorporated areas. This approach included an

agreement between the County and with the adjoining Cities that would specify acceptable levels of service (police, fire, parks, libraries, transit, utilities, etc.) and measures that would mitigate the impacts to the surrounding municipalities. These "level of service" impacts on surrounding cities were to be evaluated in the EIR and discussed in a fiscal impact analysis. Costs and revenues to both the Cities and the County, resulting from the modifications to the County's land use plan were to be considered in such an analysis. We look forward to reviewing the findings of this analysis but believe it should be considered in the service level impacts in the EIR and the fiscal impact analysis should be a supporting document similar to other technical studies.

Thank you for your consideration of these comments. The City looks forward to working with the County to secure a university and protect the existing and future landfill expansion area.

Sincerely,



Matthew J. Wheeler, P.E.
Community Development Director

Cc: Jennifer Hanson, Lincoln Interim City Manager
Steve Pedretti, Placer County CDRA Director