

February 22, 2019

To: Shirlee Herrington

From: Charlene Daniels

Subject: Sunset Area/Placer Ranch Specific Plan Draft EIR

Thank you for the opportunity to comment on the Sunset Area/Placer Ranch Specific Plan Draft EIR. I have the following comments that primarily focus on the Placer Ranch EIR.

#### Land Use

- The EIR needs to provide a more thorough discussion and provide adequate documentation as to why the one mile buffer currently required by the PCGP needs to be reduced. It seems that if the County is already receiving numerous complaints about the landfill, it indicates that the current one mile buffer is not adequate. Although the analysis cites other agencies that have a buffer less than one mile, this seems immaterial when there is clearly a problem with the existing facility.
- If the EIR has already determined that there will be a substantial increase in the number of complaints about the landfill, the proposed change to reduce the land use buffer is inconsistent with PCGP policy 4.G.11, which requires the landfill be protected from incompatible encroachment. The EIR analysis does a good job in documenting this incompatibility by recognizing that complaints will increase as the specific plan develops. Is the County proposing to eliminate the requirement that the landfill be protected from incompatible development?
- The EIR has determined that reducing the land use buffer for the landfill will result in a Significant and Unavoidable impact. The analysis recognizes that the County will be receiving an increase in complaints as a result of sensitive land uses being located so close to the landfill. Will the developer provide mitigation funds to the County and the Air Pollution Control District to offset the increased costs associated with the increased number of complaints?
- The EIR also states that the County may have to alter the manner in which the landfill operates, will the Placer Ranch property owner be required to pay for any changes in how the landfill will operate in order to reduce nuisance complaints?

#### Population and Housing

- Housing Element policy B-6 “Affordable units need to be provided in a timely manner ....” needs to be added to the list of applicable general plan policies. The project descriptions need to explain in greater detail how this will be implemented.
- On page 4.12-12 of the EIR, it states that *the project is generally consistent with at the applicable General Plan policies as discussed, impacts related to General Plan consistency would be less than significant.* Additional discussion of the various housing element policies is needed in the EIR and the Specific Plan to verify that this statement such as:

- Will each small lot tentative map be required to provide the 10% affordable housing requirement. If not, how will the obligation be redistributed to ensure that the specific plans will ultimately provide the 10% requirement?
- The Placer Ranch Specific Plan states that in-lieu fees could be used to provide affordable housing. The Specific Plan/project description needs to recognize that the County has not adopted the nexus study which would allow for in-lieu fees to be collected. Most importantly, it is not known that if the County should decide to approve an in-lieu fee amount, will the in-lieu fee sufficient to cover the full cost of constructing the required housing?
- If all or most of the affordable housing units are provided in the High Density Residential area, would this result in a concentration of units (housing policy B-4) and would it also locate the affordable units closer to the landfill than other residential units within the specific plan?
- The Specific plan/project description needs to clarify that the 10% affordable housing requirement will not be used to provide housing for the college students (dormitories). If the project description increases the need for affordable housing by including student housing, it should not take away from the need for affordable housing that is already generated by the specific plan itself.

Placer ranch eir comments