

Shirlee Herrington

From: Carol Holliman <carolholliman@gmail.com>
Sent: Friday, February 22, 2019 9:35 AM
To: Placer County Environmental Coordination Services
Cc: Shirlee Herrington
Subject: Comments on Draft EIR for Sunset Area Plan/PRSP

February 22, 2019

Placer County Community Development Resource Agency,
Environmental Coordination Services
3091 County Center Drive #190
Auburn, CA 95603
Attn: Shirlee Herrington, Environmental Coordinator

Dear Ms. Herrington,

I am a resident of Placer County, living in Auburn. I have reviewed the County's Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County:

The DEIR Section 2, Executive Summary, Table 2-1 lists all of the significant and unavoidable impacts under "Summary of Environmental Impacts and Recommended Mitigation Measures" with their corresponding DEIR reference number. I was very concerned to observe that there are sixty impacts listed as "Significant and Unavoidable" (SU) after mitigations. My first request is that the County fully consider the implications of each of these, rather than accept each SU conclusion and continue forward. None of the DEIR alternatives adequately address the majority of these SU impacts, so new, more effective alternatives should be sought, and the DEIR revised and re-circulated in light of superior alternatives.

As a daily commuter to work in Sacramento along I-80, I am particularly alarmed by the potential impact to transportation and circulation. According to the DEIR Section 2, Executive Summary, Table 2-1, section 4.14, there are 25 listed impacts, 12 of which are Significant and Unavoidable (SU) after mitigation. There are numerous impacts which decrease the Level of Service (LOS) from an acceptable level to an unacceptable level LOS D or worse. One of the worst examples is that of the Woodcreek Oaks Boulevard / Painted Desert Drive intersection, which currently operates at LOS F during a.m. peak rush hour; it would experience an increase in delay of more than 200 seconds per vehicle (4.14-4). The Alliance for Environmental Leadership (AEL) estimates an increase in daily vehicle trips of 895,317 based on data provided in the January draft of the SAP [Consumer Initiated Smart Growth Plan, pgs 47,66-67], an incredible additional load on roads that are already struggling to handle the current VMT load. The many significant impacts to transportation and circulation described in the DEIR should be of major concern to the County and all residents the neighboring cities.

In her presentation during the February 14th, 2019 public hearing on this DEIR, Crystal Jacobsen explained that many of the traffic-related SU's were listed as SU because they were outside of the jurisdiction of the County. She also noted that the primary mitigation for these impacts was the use of a fair-use charge on developers to fund road improvements. I was under the impression that she was suggesting that the many SU's were not as serious as it appeared for this reason. I respectfully disagree. Building permits would be issued when the fee is paid, even though in many cases no existing approved plan exists to address the additional road improvements required even if funding was

available. It is not appropriate to approve a development plan, or the EIR that reports on it, based on vague future expectations. As my second request, I ask that you require effective, fully funded mitigation plans before considering approval of the EIR.

As indicated above, the primary mitigation shown in the DEIR is that of charging the developer a fair-share impact fee to fund construction of transportation facilities and/or improvements in the affected area. The DEIR does not adequately address other measures that exist to reduce impact, and is thus not in compliance with CEQA. Other measures include the fully funded creation of light rail / Rapid Transit options, the construction of a transportation center, car sharing programs and more substantial plans for residential models where more residents live and work within a ¼ mile radius, with supporting services, such as shops, restaurants and hospitals. A much better alternative is extensively documented in the AEL's Citizen Initiated Smart Growth Plan (CISGP). My third request is that you also recirculate the DEIR after inclusion and evaluation of the CISGP alternative to allow full and thorough analysis. This Plan is environmentally superior to the proposed project and meets County objectives as set forth in the DEIR.

Thank you for the opportunity to provide comments on the DEIR. I look forward to a comprehensive response from the County.

Sincerely,

Carol Holliman
5207 Morningside Ave,
Auburn, CA 95602
(530) 878-1427