

February 14, 2019

Comments to the Placer County Planning Commission public hearing for the Draft Environmental Impact Report for the Sunset Area Plan and Placer Ranch Specific plan

Chair and Members of the
Placer County Planning Commission
3091 County Center Drive #140
Auburn, CA 95603

Attn: Shirlee Herrington, Environmental Coordinator
sherring@placer.ca.gov

Dear Ms. Herrington and Chair and Members of the Placer County Planning Commission:

I have reviewed the County's Draft Environmental Impact Report (DEIR) for the Proposed Sunset Area Plan and the Placer Ranch Specific Plan and I have questions, comments and concerns that I respectfully request be addressed by the County:

The table 2-1 of the Executive Summary lists 57 Significant but Unavoidable environmental impacts that would result from implementing the SAP. Some of these impacts are unavoidable because they occur outside the jurisdiction of Placer County, like the expansion of the Pleasant Grove Retention Facility in the City of Roseville. The environmental document for the expansion of this facility to accommodate the storm water from the SAP has not been created. Yet the SAP relies entirely on this expansion. I question whether it is even legal for Placer County to proceed with the SAP process under this tenuous situation. There is no guarantee that there will be anyplace for the storm water runoff from the SAP to go.

Section 3.4 of the Project Description contains the Goal and Objectives of both the SAP and the PRSP. But the SAP and PRSP are in conflict with these goals in many areas and my written comments will address a number of these conflicts but here are couple. One goal of the PRSP is to Foster Sustainable Community Design by aiding the County in achieving its objectives for long-term sustainability through project design and building practices that incorporate measures to reduce energy usage, conserve water, incorporate water efficient landscaping, treat storm-water, and reduce reliance on the automobile. However the project design does not meet these goals. The Citizen Initiated Smart Growth Plan which is being provided to you as an alternative to the SAP does go much further in every one of the above listed long-term sustainability goals. I think it would be prudent of you to recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan. Another goal of the PRSP is to Enable Blueprint Consistency: Create a development plan that is consistent with the growth principles identified in the Sacramento Area Council of Government's Blueprint, which consists of providing high-density residential neighborhoods; more compact forms of development; alternative transportation options, such as Bus Rapid Transit and bicycle use; and an interconnected network of residential neighborhoods, commercial nodes, and employment centers. The SAP and PRSP fail to meet the SACG blueprint and fails to provide Bus Rapid Transit compliant development. The CISGP does comply with the SACG blueprint and is Bus Rapid Transit compliant.

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