

Shirlee Herrington, Environmental Coordinator
Placer County Community Development Resource Agency
Environmental Coordination Services
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Scott Johnson
15215 Bancroft Road Auburn, CA 95602
530-878-1566
scottj@johnsonpianoservice.com

Via Email and U.S. Mail or hand delivery

Shirlee Herrington, Environmental Coordinator
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603
cdraecs@placer.ca.gov
sherring@placer.ca.gov

Re: Comments on the Draft Environmental Impact Report for the Sunset Area Plan and Placer Ranch Specific Plan

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 County's Draft Environmental Analysis for the proposed Sunset Industrial Area found 57 significant and unavoidable impacts, many of which occur onsite, that could not be mitigated if the project were implemented. These will affect the health and well being of people and the environment today and impact future generations. Examples:

- Unavoidable impact: Green house gas emission exceeding 575,000 metric tons per year - a volume so great that it is projected to have global impacts
- Unavoidable impact: Loss and degradation of State and Federally protected waters
- Unavoidable impact: Increased automobile usage exceeding 870,000 daily vehicular trips that will result in declines of levels of service, roadway operations and intersection function on major regional roadways in the County and in the Cities of Roseville and Rocklin
- Unavoidable impact: increased stormwater runoff and increased potential for downstream flooding
- Unavoidable impact: Substantial soil erosion
- Unavoidable impact: Interfere substantially with wildlife movement and conflict with local policies and ordinances protecting biological resources
- Unavoidable impact: Create objectionable odors affecting a substantial number of people

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All of the above examples of impacts could be substantially mitigated by adoption of the Alliance for Environmental Leadership [Citizen Initiated Smart Growth Plan](#) as the environmentally superior alternative. Why should the County not recirculate the DEIR to allow a full and thorough analysis of the AEL's CISGP?

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

Impact 4.1-4: New source of substantial light or glare that would adversely affect day or nighttime views in the area after build out No mitigation is available. Significant and unavoidable Impacts

This impact is listed as “no mitigation is available.” I disagree with the DEIR assertion that no mitigation's are available. I refer you to the work of the Dark Sky group and their recommendations for lighting when building new construction. The organization estimates that 30 percent of outdoor lighting in the U.S. is wasted, amounting to \$3.3 billion and 21 million tons of carbon dioxide emissions per year. Here is a link to an article with case studies.

<https://www.architecturalrecord.com/articles/11814-continuing-education-dark-sky-design>

Why would Placer County not use every available mitigation and the technologies and policies that are readily available to protect our views of the night sky? The DEIR consultant failed to analyze the importance of our night sky to wildlife (migration) and hunting. The consultant also failed to reference medical research about the importance of our night skies to the health and well being of citizens (sleep and quality of life.) Nor did the consultant analyze how high quality views of the night sky will be an attraction for Placer County as a tourist destination and a place to relocate your home to, or locate new jobs and businesses. To what degree will the light pollution generated from the SPA and PRSP site impede enjoyment of the night sky, and why are available measures available to protect the night sky for wildlife and human and economic benefit not listed under mitigations? I believe this section is inadequate because the economic, wildlife and social values of the night sky were not quantified so that these “benefits” could be compared to any projected “costs” of mitigation.

Just because these guidelines have not been followed in surrounding communities is no excuse for building more structures with non-dark sky compliant outdoor lighting. In the future as buildings in surrounding communities have their outdoor lighting retrofitted with more energy efficient lighting, they should also be brought into dark sky compliance by county statute. What is light pollution? Mark Major, principal of London-based lighting design firm Speirs + Major, explains simply that since illumination is a byproduct of energy, if you are using more than is required, or you are putting it where it isn't desired or necessary, “by definition, that is pollution.” The DEIR should quantify this pollution and the costs associated with it. Light trespass, the term for light cast where it is not wanted or needed, such as illumination from a streetlight cast into a bedroom, making it difficult to sleep is a form of light pollution which can cause harm but which can be mitigated by downward facing lighting.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

Impact 4.3-3: Long-term operational emissions of criteria air pollutants and ozone precursors Significant and unavoidable Impacts

The recommendations of the [CISGP](#) (Citizen Initiated Smart Growth Plan) for the Sunset Area would reduce the impacts of the long-term emissions. (See page 47, 64 & 65) The more compact development footprint and transit compatible planning of the CISGP will reduce car trips and encourage pedestrian and bike trips as well as (BRT) Bus Rapid Transit usage. (See page 122-125 of the CISGP) The CISGP

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replaces the 517 acre regional shopping center with an attraction center that is the same as in the SAP Entertainment and Mixed-Use District, but the Regional Shopping Center and Cornerstone District have been removed. By removing this component of the SAP, the CISGP maintains retail revenue for Lincoln, Roseville and Rocklin and will also reduce car trips. The inclusion in the Sunset Plan of a mall that is larger than the Galleria and Fountains and their surrounding retail areas combined is a holdover from earlier plans and is not relevant to the trends of today's shopping public which includes more online purchases and a preference for local business that keeps retail profits in local banks where it can be used to loan to other local businesses and homeowners instead of sending it to corporate headquarters in other states or countries.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.3-6: Create objectionable odors affecting a substantial number of people. Significant and unavoidable Impacts. Impact 4.15-11: Potential impact on Western Regional Sanitary Landfill from incompatible land use that results in insufficient permitted capacity to serve waste disposal needs. Less than significant

The DEIR is wrong here in every way. It is simply willful ignorance for the DEIR to assert that. "It is possible, but not likely, that such pressure could result in the need for WPWMA to modify WRSL operations, including possible diversion of waste to other facilities. Additionally, complaints related to the landfill and co-located operations could cause opposition to future expansion plans, and could jeopardize approval of the expansion. However, these are unlikely scenarios. WPWMA and its member agencies have a substantial investment in the WRSL and MRF, which are benefits to the region; WPWMA is planning nearterm facility improvements; WPWMA remains actively engaged with the community and stakeholders about nuisance odor issues; and WPWMA continues to be proactive about implementing odor control measures, including pilot studies to investigate the feasibility of specific technologies. For these reasons, it would be speculative to conclude that public pressure would mount to such a degree to cause something as severe as diversion of waste to other facilities, landfill closure, or denial of expansion plans. Importantly, the results of research into similar facilities indicate that landfills that are the subject of odor complaints have been allowed to expand. For these reasons, this impact would be less than significant." On the contrary I think it is speculative on the part of the DEIR to conclude that public pressure would NOT mount to such a degree to cause something as severe as diversion of waste to other facilities, landfill closure or denial of expansion plans. The DEIR does not reference what research they are citing into similar facilities so we don't know if these are similar situations. The odor impacts will be even greater than expected because the SAP does not take into account the requirement to compost 100% of food waste beginning January 1, 2020 which the WRSL (Western Regional Sanitary Landfill) will need to be in compliance with. Once the WRSL comes into compliance the odor impact will be even greater. The recommendations of the CISGP (Citizen Initiated Smart Growth Plan) (see page 24) would reduce the odor impacts by maintaining the landfill buffer zone from the WRSL for residential units and schools. Placer Ranch seeks a variance to the buffer to put 5,827 homes, an elementary school, a middle school, and a university within the mile buffer. This reduction of the buffer zone is not mitigated by disclosure agreements during property sales as alleged by the SAP and PRSP and these disclosure agreements do not prevent class action law suits that could threaten the continued use of the landfill. Closure of the landfill would impact all the ratepayers of western Placer county negatively. Protection of the rail line into the SAP is important because the

landfill will be closing in 40 years and all waste will need to be put on trains and moved to Nevada. The WRS� has been looking at expansion for the past 4 years and will be starting to work on the environmental documents for this expansion in the next year. Changes to the buffer zone will jeopardize the ability of the WRS� to undergo this necessary expansion and this impact has not been addressed in the SAP and PRSP DEIR. The effects of odor from the landfill on humans has not been quantified or given adequate consideration. These effects can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache.) With the number of odor complaints already being filed with the county from outside the SAP and PRSP area (In January 2018, WPWMA received 109 odor complaints) it is irresponsible of the DEIR to propose a reduction in the buffer zone. The increase and subsequent drop off of odor complaints coincides with the increased awareness of WPWMA's online odor reporting tool, and that odors potentially attributable to the WRS� were likely related to landfill gas (WPWMA 2018c). Odor notifications since that time have decreased, and WPWMA staff indicated they receive about two to five notifications per week. This slight decrease of complaints may be the result of weather patterns or resignation and frustration by those people affected rather than an actual reduction in odors.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Cumulative Impact 4.3-8: Long-term operational emissions of criteria air pollutants and precursors
Significant and unavoidable Impacts

Placer County is a non-attainment area for criteria air pollutants and precursors. This document OPERATIONAL CRITERIA AIR POLLUTANT AND PRECURSOR EMISSIONS states that "If operational emissions will result in a significant impact, lead agencies shall implement all feasible mitigation to reduce the impact." By saying that there is "No Mitigation Available" the SAP throws up its hands and admits defeat. On the other hand the CISGP (Citizen Initiated Smart Growth Plan) (see page 64 & 65) does reduce contributors to criteria air pollutants and precursors by reducing motor vehicle trips generated by the particular land uses (i.e., vehicles arriving and leaving the project site), including those by residents, shoppers, workers, and vendors.) The CISGP (see page 37) does this in part by replacement of the 517 acre regional shopping center with an attraction center that is the same as in the SAP Entertainment and Mixed-Use District, but the Regional Shopping Center and Cornerstone District have been removed. By removing this component of the SAP, the CISGP maintains retail revenue for Lincoln, Roseville and Rocklin. It will also reduce car trips thereby mitigating some of the long-term operational emissions of criteria air pollutants and precursors. The more compact development footprint and transit compatible planning of the CISGP will reduce car trips and encourage pedestrian and bike trips as well as meeting the needed density to be (BRT) Bus Rapid Transit compatible. Being BRT compatible (See page 122-125 of the CISGP) is important as the Capitol Corridor commuter train builds the third rail project (now funded) bringing 10 more commuter trains to Placer County per day. The BRT is needed to provide connections to these new trains. [View the third main rail project plans here](https://images.capitolcorridor.org/wp-content/uploads/2019/01/CCJPABizPlanFY1920_PublicDraft.pdf). See chart on page 10 https://images.capitolcorridor.org/wp-content/uploads/2019/01/CCJPABizPlanFY1920_PublicDraft.pdf

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Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

Impact 4.4-1: Loss and degradation of state or federally protected waters Significant and unavoidable Impacts

The [CISGP](#) (Citizen Initiated Smart Growth Plan) embraces the wider setbacks from streams that are recommended by the Placer County Zoning Ordinance and those setbacks will reduce the degradation of state or federally protected waters from what they would be under the SAP. Changes in the land use planning of the CISGP (see page 31) will allow streams to meander as explained on pages 90, 91 & shown on page 121 of the CISGP. Protection of the Auburn Ravine watershed by increasing buffers on the SAP site is important in the ongoing efforts, in which I am personally involved, to restore and protect the endangered Central Valley Steelhead and the species of concern Fall Run Chinook Salmon that both populate Auburn Ravine. See pages 72 & 73 of the CISGP to quantify the Important Riparian Buffers acres protection provided in the CISGP vs. the SAP. Because of a long history of grazing on the SAP site there is a need for stream bank restoration. Trees and bushes need to be planted along these stream banks to stabilize them and restore damage done by grazing. The DEIR does not give adequate attention to this need for stream bank restoration.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

Impact 4.4-3: Loss of federally listed vernal pool branchiopods and western spadefoot. Significant and unavoidable Impacts

The most significant ecological factor on site are the vernal pools. The Report of Science Advisers (County of Placer Natural Community Conservation Plan Habitat Conservation Plan, Report of the Science Advisers, Phase 1." Burssard, P. et al. January 8, 2004.) states that, "In Placer County, urbanization, industrial development, and infrastructure construction have resulted in substantial losses of vernal pool ecosystems. The creation of new vernal pools in mitigation banks is of marginal long-term conservation value at best. Rather, effective conservation must focus on the protection of archipelagos of pools containing a number of pools and pool types plus a substantial portion of the surrounding catchment area." See page 24 of the [CISGP](#) (Citizen Initiated Smart Growth Plan) for figures on the historical loss of vernal pools in Placer County. The SAP contains 17% of the remaining vernal pool habitat in Placer County and also the largest continual vernal pool complex. Conservation Management in the SAP referenced from the report of the Science Advisers cited above appear on page 114 of the CISGP and these conservation measures should be followed on the SAP. The SAP university land is donated by the developer and landowner of Placer Ranch, Eli Broad. The university site is a subdivision of a larger parcel with the an assessed market value of approximately \$20 million. All 300 acres are a vernal pool complex. Mitigated through the PCCP, the total land conversion and special habitat fees are upwards of \$40 million. By moving the university site to a different location within the SAP the [CISGP](#) (Citizen Initiated Smart Growth Plan) forestalls the impacts that the The Natural Resources Conservation Service identifies when it explains that all the main soil types have properties that severely limit their abilities to support buildings. Fiddyment soil is the most accommodating soil, providing only moderate limitations for shallow excavation. The limitations for the other types are either related to water or the shallowness of bedrock/cemented clay pan. These limitations for construction are the features that enable and sustain the vernal pool landscape. To prepare the soil for construction, it is likely that the soil will be scraped deeply and compacted with

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lime or other stabilizers to manufacture the desired structural properties. This will require specialty equipment. To eliminate complexity, entire parcels will be compacted and shaped by deeply cut roads, drains and overflow ponds. Such soil preparation is irreversible. The SAP does not do enough to fit new encroaching land uses around the vernal pool landscape but instead allows the superimposing of developer desired land uses onto the valuable and biodiverse vernal pool landscapes.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.4-4: Loss of valley elderberry longhorn beetle Significant and unavoidable

I have observed that the planting of elderberry shrubs as mitigation for removal during construction on, for instance, the Winchester Estates property near my home, are subject to a very poor survival rate due to a lack of follow-up by the Placer County Community Development Department to ascertain if the mitigation has been effective. The elderberry is not only a host to the endangered valley elderberry longhorn beetle but is an important habitat developer, as the name implies. Elderberry also provides abundant food for native bird species. It is also a cultural artifact for the local Native American families who collect the stems for sacred musical instruments including flutes and percussion instruments. The berries are also collected as sacred medicine and eaten or processed into food. I question if the EIR consultant did an adequate biological survey to ascertain if elderberry exists on the site. I don't see where it is stated that this plant was found in the SAP or that any survey was ever conducted. In the PRSP area reconnaissance surveys were conducted in 2005 and 2017 that did not find elderberry. In section 4.4-4 of the Biological Resources section of the DEIR under Methods for Documenting Existing Biological Conditions, I see that no survey was done of biological resources in the SAP for the purpose of this DEIR. It is my belief that the document cannot be considered valid without a biological survey being done. Due to long time grazing of much of this site there is a need for stream bank restoration. Although I have observed mature elderberry bushes withstanding grazing for a few years, they are impacted, and because they are such an important species they should be part of any restoration program once grazing has stopped.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.4-5: Disturbance or loss of special-status reptile, bird, mammal, and fish species Significant and unavoidable

The improvement of the **CISGP** (Citizen Initiated Smart Growth Plan) over the SAP in preserving riparian corridors and native grasslands will help preserve some of the species displaced by construction on the site. Preservation of native oaks and other measures found on page 100 of the GISGP should also be implemented as part of any plan for this area. Because no biological survey was done in preparation for the DEIR there may be a misplaced emphasis on preservation of native oaks. How many oaks to be preserved do occur on this portion of the western Placer prairie? We don't know because the DEIR does not contain that information. It should contain information on how many oaks are on the site and how many would be destroyed in order to implement the SAP and PRSP. So I strongly question if the DEIR is an adequate environmental document. The DEIR must tell you what you are losing and what the cost of mitigating that loss will be in order to make good land use choices in planning. Otherwise the plan is just letting land speculators drive development instead of following the goals and objectives of the plan area. Any urban or suburban development will change the mix of species that thrive in rural environments to a mix that is more compatible with the new land uses. This

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is why more compact development adjacent to larger open space areas is a better way to mitigate species loss than the suburban sprawl that the SAP and PRSP cause with their emphasis on single family homes built on former wet lands.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.4-6: Loss or degradation of riparian habitat Significant and unavoidable

The SAP mitigation relies too heavily on payment of mitigation fees to a CDFW-approved mitigation bank or participation in the PCCP if it is approved. Some of these types of mitigation will be required, but by increasing the buffers to riparian habitat as the **CISGP** (Citizen Initiated Smart Growth Plan) does (see pages 72 & 73), more of the on-site riparian habitat can be preserved. Because of the exceptional high value riparian areas on the site, this increased buffering should be required. Changes in land use under the CISGP will also reduce loss and degradation of riparian habitats. This is especially true on the Placer Ranch property where, instead of single family housing and a University District as the SAP envisions, the CISGP calls for an Innovation Campus District wrapping around the The Urban Recreation network. (See page 31, 48 & 49 of CISGP.) Because of the history of grazing on the SAP it will be necessary to do planting of native shrubs and trees that were lost during the years of grazing. The DEIR fails to address this need and this failure will have a negative impact on riparian habitats.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.4-7: Conflict with local policies or ordinances protecting biological resources Significant and unavoidable impact

The changes in land use planning for the SAP and PRSP mapped out in the **CISGP** (Citizen Initiated Smart Growth Plan) (see page 31) reduce the conflicts with local policies and damage to biological resources. The moving of the University off the Placer Ranch property and replacement of single family homes in the Placer Ranch area with the Innovation Campus District allows more flexibility in planning and minimizes the conflicts and damage. The Innovation Campus District wraps around the The Urban Recreation network which is the focal point and primary pedestrian thoroughfare providing opportunities for a spectrum of outdoor uses from urban lawn to riparian walks and programmable edges. It provides the 'walk in the woods' design requirement called for in modern planning. For instance rather than needing to mitigate tree loss with off site plantings because single family housing and the University district were superimposed onto sensitive biological resource areas of the Placer Ranch property, the CISGP allows for retention of more of those trees with the Innovation Campus District wrapping around the Urban Recreation network. (see page 48 & 49 of CISGP) Retention of mature trees along riparian corridors will also reduce special-status species loss. The mitigation measures proposed in the SAP only address tree loss instead of how to avoid tree loss with better land use planning. That said, the DEIR may be putting a misplaced emphasis on preservation of native oaks. How many oaks to be preserved do occur on this portion of the western Placer prairie? We don't know because the DEIR does not contain that information. It should contain information on how many oaks are on the site and how many would be destroyed in order to implement the SAP and PRSP. So I strongly question if the DEIR is an adequate environmental document. The DEIR must tell you what you are losing and what the cost of mitigating that loss will be in order to make good land use choices

in planning. Otherwise the plan is just letting land speculators drive development instead of following the goals and objectives of the plan area. There is no mention of how to mitigate for loss of special-status plants and animals, wetland and riparian habitats, vernal pool complexes, streams and stream zones, and large, un-fragmented areas of natural habitat, even though plan implementation would result in removal and/or degradation of these resources and would conflict with local ordinances and policies. The proposed mitigation measures are clearly inadequate. 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. 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 meeting every one of the above listed long-term sustainability goals. I think it would be prudent and I request that the county recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan as the environmentally superior alternative. 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 SACOG Blueprint and fails to provide Bus Rapid Transit compliant development. The CISGP does comply with the SACOG Blueprint and is Bus Rapid Transit compliant. Moving the senior housing closer to the urban core as the CISGP does will better meet the SACOG and DEIR objective of providing an interconnected network of residential neighborhoods, commercial nodes, and employment centers.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.4-8: Interfere substantially with wildlife movement Significant and unavoidable
The California Essential Habitat Connectivity Maps on page 110 & 110 of the **CISGP** (Citizen Initiated Smart Growth Plan) shows the farmland to the west of the SA as a major migration corridor. Various fauna use this corridor to move between the grasslands and the high Sierras. At Roseville the habitat corridor is cut off. It may be surmised from the zoomed out map that it once connected with a corridor in Davis or a corridor southeast of Interstate 80. Pages 98,99 & 100 of the CISGP address the changes that development of the SAP will make to Species Displacement & Migration along with some recommendations of how to best minimize these inevitable changes. Changes proposed to land use in the CISGP will help to preserve more of the food and shelter plants that support wildlife more effectively than the SAP zoning would have done. For this reason the County should recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan as the environmentally superior alternative.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

4.7-2: Operational greenhouse gas emissions Significant and unavoidable impact

In light of U.S. government and International scientific reports released in 2018 that give humankind 12 years to stop an irreversible catastrophic climate crisis caused by CO₂ and other GHG (Green House Gas) emissions, it is important that the [CISGP](#) (Citizen Initiated Smart Growth Plan) (see page 66, 67 & 69) does reduce the levels of GHG below the estimates for the SAP and PRSP found in the DEIR. The CISGP reduces GHG levels in 12 of 12 categories including Annual passenger vehicle emissions; Annual building energy emissions; Annual water-energy emissions; Annual passenger vehicle emissions per household; Annual building energy emissions per household; Annual water-energy emissions per household; Annual NO_x emissions; Annual PM₁₀ emissions; Annual PM_{2.5} emissions; Annual SO_x emissions; Annual CO emissions; Annual ROG/VOC emissions, and reduces overall GHG emissions by 2139 million metric tons per year. The chart on page 69 of the CISGP show the comparison between carbon storage in the CISGP and the SAP both in the Net Change in Carbon Stock Measured and as Equivalent Passenger Vehicles Driven per Year. The SAP reduces the carbon stock by 8,605 million tons more than the CISGP reduces the same carbon stock. In terms of passenger vehicles driven per year the CISGP carbon retention equals a reduction of 6755 passenger vehicles driven per year compared to the SAP. Because of this, the county must recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan as the environmentally superior alternative. The DEIR uses an 80 year build out DEIR 3-27, but states that, "the amount of land development associated with the EMU district is speculative, given the absence of a specific project proposed in this district. However, local economic development representatives and land owners, and market factors suggest the SAP may be a potential location for a major destination entertainment or retail project." The DEIR does not provide any detailed information about who these economic development representatives and land owners are, or what they suggested exactly, or what the market factors are that are being used to indicate the SAP/PRSP areas as a location for a major destination entertainment or retail project. Without this information it is not just speculative but impossible to give credence to the acceptability of projections for land development associated with the EMU district. The county and the public cannot rely on the conclusions of the DEIR under such fluid conditions. The EMU district and the amount of development in this land use would be a major factor in determining GHG emission impacts and mitigation. The DEIR is not specific as to which impacts result from which of the 20 year phases and beyond that are being calculated for. This makes the DEIR useless for evaluating the impacts. The vague and fluctuating build out projections make the creation of an adequate DEIR impossible. At 4.12-10 the DEIR projects generation of 40,804 new jobs, but at 4.12-8 the DEIR says the area could support up to 15,300 jobs by 2035 and the number of jobs that could be supported according to the market analysis is lower than the number assumed at build out. What it does not say is which numbers of jobs the impacts and mitigation measures are based upon. This makes the DEIR useless for evaluation of the environmental impacts. The DEIR also does not explain how many of these jobs will be primary wage earner jobs, which is absolutely necessary to plan for housing if you intend to make a good faith effort to reduce VMT's and GHG emissions. Also at 4.12-11 the DEIR acknowledges that the build out of the SAP and PRSP areas will have significant unavoidable impacts on the environment, but there is no analysis of these impacts as is required by CEQA in any DEIR, and no proposed changes to the project to offset some or all of those impacts such as reducing the number of housing units or changing the housing mix, are discussed. The reliance on

carbon offset programs to mitigate the 46,361,760,000 (46 billion) ton operational GHG emissions over the 80 year build out (4.7-21 and appendix K) is not allowed under CEQA unless there is a functioning, enforceable, and effective implementation program. Where does the DEIR provide evidence that the offset program would be enforceable or effective? The fees for offsets are expensive and the DEIR does not take into account whether project proponents would be able to afford the fees. Fees currently run from 8 to 35 dollars per metric ton of CO₂e. (DEIR at 4.7-21) Because this comes out to 1.6 billion dollars to offset 46 billion tons of GHG, and the DEIR does not explain how the project proponents will be able to afford this amount in offset fees, the DEIR fails to provide evidence that the offset fees are a feasible form of mitigation. Because of the cost and the requirements imposed by CAPCOA and CARB for the offset fees to be legal, and the lack of any explanation in the DEIR of how the requirements will be met or enforced, the proposal of carbon offset programs is not a feasible mitigation. The DEIR admits that the affordability and availability of GHG credits in the future is unknown. (4.7-23) The County cannot, as it does in the DEIR, conclude that the impact is significant and unavoidable and leave it at that. A more detailed analysis of how adverse the impact will be is required and the County must propose all feasible mitigation to substantially lessen the significant environmental effect. CEQA Guidelines 1509 (a)(1), 15126.2(b) (requiring an EIR to discuss “any significant impacts, including those which can be mitigated but not reduced to a level of insignificance”.) Other measures exist to reduce impacts. If they are not already part of the proposed requirements for development or proposed as mitigation, the County must consider and adopt the list below of feasible measures. If the County rejects any of these measures, it must support its decision with substantial evidence.

1. Transportation and Motor Vehicles

- Create car sharing programs. Accommodations for such programs include providing parking spaces for the car share vehicles at convenient locations accessible by public transportation.
- Create local “light vehicle” networks, such as neighborhood electric vehicle (NEV) systems.
- Build or fund a transportation center where various public transportation modes intersect.
- Contribute funding to local and regional transit agencies.
- Provide public transit incentives such as free or low-cost monthly transit passes.

2. Energy Efficiency

- Site buildings to take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use.
- Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings.
- Install light colored “cool” roofs, cool pavements, and strategically placed shade trees.
- Provide information on energy management services for large energy users.
- Install energy efficient heating and cooling systems, appliances and equipment, and control systems.
- Install light emitting diodes (LEDs) for traffic, street and other outdoor lighting.
- Limit the hours of operation of outdoor lighting.
- Provide education on energy efficiency.

3. Renewable Energy

- Install energy-efficient heating ventilation and air conditioning. Educate consumers about existing incentives.
- Use combined heat and power in appropriate applications.

4. Water Conservation and Efficiency

- Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.
- Design buildings to be water-efficient. Install water-efficient fixtures and appliances.
- Restrict the use of water for cleaning outdoor surfaces and vehicles.
- Implement low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on-site can drastically reduce the need for energy-intensive imported water at the site.)

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

Impact 4.9-1: Increased stormwater runoff and potential for downstream flooding Significant and unavoidable

Table 2-1 of the Executive Summary mentions the Pleasant Grove Retention Facility (PGRF) 32 times in identifying the impacts of the project. Is it legal for this DEIR to rely on so many mitigation measures to be addressed by a project like the PGRF which has not yet gone through environmental review and has been identified as having itself many significant and unavoidable impacts? These impacts include : interfere substantially with native nursery sites (bat colonies), loss of trees protected under City ordinance, impacts on riparian habitat, possible impacts on special-status reptile, bird, and mammal species, impacts on valley elderberry longhorn beetle, vernal pool fairy shrimp, vernal pool tadpole shrimp and western spadefoot impacts, loss of vernal pool invertebrates, impacts on special-status plant species, loss of aquatic resources, loss of farmland converted to nonagricultural uses on the Pleasant Grove Retention Facility property. There seems to be some ambiguity in the DEIR regarding the loss of cultural sites caused by construction of the PGRF. Under **Impact 4.5-2: Change in the significance of a unique archaeological resource**, mitigation measures are outlined for the four archaeological sites and two multicomponent sites known within the Net SAP area, but the following statement occurs: “however, the Pleasant Grove Retention Facility and a portion of the Off-Site Transportation and Utility Improvements would not be subject to these policies. This impact would be potentially significant.” Is this because the mitigation of impacts on these cultural sites would be the responsibility of the City of Roseville? Again I wonder, is it legal for Placer County to pursue a strategy basing mitigation measures for the SAP on a project, the PGRF, that has not yet fulfilled the requirements of approval? **Impact 4.9-1: Increased stormwater runoff and potential for downstream flooding**. Under this impact the DEIR states that, “the City of Roseville or a City of Roseville / Placer County JPA would be the project proponent and CEQA lead agency for implementation of the Pleasant Grove Retention Facility. Because the County could not enforce implementation of this off-site retention project, this impact would be significant.” Can the impacts of storm water run off from the SAP at build out be mitigated without the PGRF? On page 23 of the DEIR section Sunset Area – Storm Drainage Technical Report it reads, “ The specific location for retention has not yet been determined, however, regional retention facilities within the Natomas Cross Canal watershed are planned to be

utilized. The City of Roseville's Reasons Farms (now called the Pleasant Grove Retention Facility) regional retention basin is currently being analyzed for proposed offsite retention in the Pleasant Grove Creek Watershed and two alternative regional locations are being proposed in the Auburn Ravine Watershed. Should the Sunset Area develop prior to regional facilities becoming available, interim retention facilities will be utilized." The DEIR does not provide any detail about where, or about the cost of these interim retention facilities. This is a major inadequacy of the DEIR. These two alternative locations are not identified in the DEIR, but Lakeview Farms in the City of Lincoln in the Coon Creek watershed some miles away is addressed in the Sunset Area – Storm Drainage Technical Report section of the SAP DEIR. The transportation of storm water to the Lakeview Farms site would require installing storm drains under the Auburn Ravine in areas where endangered Central Valley Steelhead and threatened fall run Chinook Salmon spawn. Storm drains under creeks eventually become exposed creating barriers to fish passage. It is not adequate for the DEIR to take the opinion that because an impact like creation of a barrier to fish passage takes place off site that the project has not responsibility for that impact. If the storm-water from the SAP is in the pipe that is causing the blocked fish passage, it is clearly an impact caused by development on the SAP. At the planning commission hearing for the DEIR on February 14, 2019, lead planner Crystal Jacobson said that on site storm-water storage was being considered. I don't find any mention in the DEIR of interim on site storm-water retention. If the County is using this as a backup plan it should be addressed in the DEIR. The DEIR for the Pleasant Grove Retention Facility states that the cost of building the facility is \$20,350,000 to 28,125,000 in 2002 dollars, not including any enhanced restoration planting or recreation trails. That cost in today's dollars is now 40% higher. This cost estimate is for the initial facility, not including the expansion to accommodate the SAP and PRSP. The environmental document for the expansion has not yet begun to be developed. The SAP and PRSP DEIR does not address how this money will be raised, but relies on the project being built to accommodate the storm-water run off from the project. I question if 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. When I asked Crystal about the cost of the PGRF expansion to accommodate storm-water from the SAP and PRSP, she said the details on how the money will be raised is the responsibility of the City of Roseville where the site is located. So I conclude that is the opinion of the DEIR. Why can the DEIR rely on the PGRF expansion without any attention to how it will be funded?

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

Impact 4.9-4: Water quality impacts from urban land uses Significant and unavoidable

This impact description states, "projects within the project area would be required to comply with CVRWQCB, Placer County, and proposed SAP regulations, and permit conditions and would implement LID measures and stormwater BMPs to prevent urban pollutants from being carried into surface waters" However again there is no mention under the proposed mitigation measures of the Pleasant Grove Retention Facility PGRF. Is it possible for the project to meet the storm water regulations designed to prevent water quality impacts without the PGRF?

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

Impact 4.9-5: Development within 100-year floodplains Less than significant

The mitigation measures for this impact call for “finished building pad elevations to be a minimum of 2 feet above the 100-year floodplain line (or finished floor 3 feet above the 100-year floodplain line.)”

What I do not see are any references to how long the 100 year floodplain map will remain reliable in light of the changes in spring run off due to warming spring weather and stronger storms as a result of the climate change we are now experiencing. The 5 hottest years on record have occurred during the past 5 years [according to a NASA](#) . “the past five years become the five warmest since reliable measurements began more than a century and a half ago. Gavin Schmidt, director of NASA’s Goddard Institute for Space Studies, says it’s part of a trend that’s poised to see the planet become much hotter.

Gavin Schmidt: “What kind of planet is a planet that’s 4 or 5 degrees warmer than it is now? Well, we haven’t seen that on Earth since about 3 million years ago in the Pliocene. At that point, we had forests all the way up to the Arctic Circle, there wasn’t any ice, there was no Greenland, and sea level was about 25 meters higher. Right? That was a very different planet, and that’s kind of where we’re headed, unless we do something about emissions.” Wednesday’s (2-6-2019) climate report came as two House committees held simultaneous hearings to discuss the climate crisis. They were the first such meetings on Capitol Hill in six years. What mitigation measures have been modified by the DEIR consultant to take into account changes that are currently taking place in our climate?

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

Impact 4.14-10: Impacts to freeway operations Significant and unavoidable

The SAP falsely asserts that it is mitigating this impact by requiring or providing incentives to build housing in the SAP that will comply with Bus Rapid Transit compatible design. Page 52 of the CISGP provides the Exclusive Comparison: Accessibility - Walk Report. This shows that with the CISGP 100% of residents are living in minimum required density of 9 du/ac to support Bus Rapid Transit as outlined in the SACOG Blueprint and the Conceptual Bus Rapid Transit (BRT) plan for South Placer County, (see sections 3 and 4) as opposed to the SAP where only 12% of residents live within the required density of 9du/ac. In the CISGP 45% of Non-Residential Uses comply with the minimum FAR (floor area ratio) of 1.0 required to support Bus Rapid Transit as opposed to 0% in the SAP. For the Work Commute under the CISGP 100% of Residents live within 15 minute walking distance of a job site. Under the SAP this figure is only 9%. Under the CISGP 61% of of Job sites are within 15 minute walking distance for a residence while under the SAP this number is only 38%.The SAP fails to provide the required density of development to be Bus Rapid Transit compatible according to the SACOG blueprint. The CISGP does comply with the SACOG blueprint and is Bus Rapid Transit compliant, and so the county should recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership’s Citizen Initiated Smart Growth Plan as the environmentally superior alternative.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

Impact 4.12-1: Population growth from new homes and businesses Significant and unavoidable

The DEIR lists no mitigation for this impact but admits that “the physical effects resulting from this level of population and employment growth (e.g., traffic generation, air pollutant and GHG emissions,

noise, demand for services, construction of utilities and infrastructure) would be substantial. This impact would be significant.” But if the County recirculates the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership’s Citizen Initiated Smart Growth Plan as the environmentally superior alternative, and the CISGP is adopted as the preferred plan, there will be significant reductions in the impacts from population growth from new homes and businesses. On page 46 of the CISGP the Exclusive Comparison evaluates at the zoning level only, excluding CISGP reduction measures such as public transit and walking trails that would reduce impacts further. Because of this it is a fair comparison with the SAP and also represents a worst case scenario. The SAP numbers are the combined totals from the December 2018 SAP Draft and December 2018 PR Draft. In the category of GHG Emissions Per Household by Source, metric tons / household / year, the CISGP reduces emissions below combined SAP and PRSP levels by 79% for annual passenger vehicle emissions per household (and this is without public transit). Emissions for annual building energy emissions per household are reduced under the CISGP by 39% and Annual water-energy emissions per household are reduced under the CISGP by 66% from the SAP PRSP levels. Page 52 of the CISGP provides the Exclusive Comparison: Accessibility - Walk Report. This shows that with the CISGP 100% of residents are living in minimum required density of 9 du/ac to support Bus Rapid Transit as outlined in the SAGOG Blueprint and the Conceptual Bus Rapid Transit (BRT) plan for South Placer County, (see sections 3 and 4) as opposed to the SAP where only 12% of residents live within the required density of 9du/ac. In the CISGP 45% of Non-Residential Uses comply with the minimum FAR (floor area ratio) of 1.0 required to support Bus Rapid Transit as opposed to 0% in the SAP. For the Work Commute under the CISGP 100% of residents live within 15 minute walking distance of a job site. Under the SAP this figure is only 9%. Under the CISGP 61% of of job sites are within 15 minute walking distance for a residence while under the SAP this number is only 38%.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

Impact 4.14-2: Impacts to intersection operations in Placer County Less than significant

I disagree with the claim of a less than significant impact. The DEIR bases this assertion on fair share fees offsetting impacts, but those fees come available for use long after the impacts are already being felt, so the impacts will be significant. If the County recirculates the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership’s Citizen Initiated Smart Growth Plan as the environmentally superior alternative, these impacts will be reduced substantially because the CISGP reduces VMT (vehicle mile trips) as shown on page 64 of the CISGP. The Comparison in Context: Transportation Report shows the reduction under the CISGP from the SAP in Average Annual VMT per Household is 1475.55 in billions of miles per year. Rather than relying only on fair share fees to offset impacts, the DEIR should be looking at an environmentally superior alternative that will reduce the impacts on intersection operations through reduction of total vehicle mile trips.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

Impact 4.14-3: Impacts to signalized intersection operations in the City of Roseville Significant and unavoidable and Impact 4.14-4: Impacts to unsignalized intersection operations in the City of Roseville Significant and unavoidable Impact 4.14-5: Impacts to intersection operations in the City of Rocklin Significant and unavoidable Impact 4.14-6: Impacts to intersection operations in the City of Lincoln Significant and unavoidable Impact 4.14-9: Impacts to intersection operations under Caltrans jurisdiction Significant and unavoidable Impact 4.14-12: Impacts to vehicle miles traveled Significant and unavoidable

If the county recirculates the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan as the environmentally superior alternative, these impacts will be reduced substantially because the CISGP reduces VMT (vehicle mile trips) as shown on page 64 of the CISGP. The Comparison in Context: Transportation Report shows the reduction under the CISGP from the SAP in Average Annual VMT per Household is 1475.55 in billions of miles per year. Rather than relying only on fair share fees to offset impacts, the DEIR should be looking at an environmentally superior alternative that will reduce the impacts on intersection operations through reduction of total vehicle mile trips.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

4.14-10: Impacts to freeway operations Significant and unavoidable Impact

It should be noted in the DEIR that the funding to make the necessary improvements to Hwy 65 and Hwy 80 in order to compensate for the impacts of increased VMT resulting from the projected build out of the SAP and PRSP areas has not been identified as of yet.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

Impact 4.15-10: Consistency with applicable general plan policies Less than significant

I contest the DEIR statement that the SAP and PRSP are consistent with the Placer County General Plan. Under the housing element of the PCGP the projected housing needs for various categories of housing types are listed on page 49. The mix of housing listed here does not dovetail with the housing mix for the SAP and PRSP. The proposed land use map does not integrate workforce and affordable housing in with other types of housing as required by the PCGP but locate it clustered up against the Placer Parkway and inside the smell zone of the sanitary landfill. University housing should not be counted in the 10% affordable housing requirement, and this stipulation should be stated in the DEIR. The CISGP states as a goal under Housing Choice Support: "Provision of attractive and under represented housing types locally to accommodate employees of Sunset Area businesses and make a synergistic atmosphere. Integrate housing into mixed use areas to prevent housing islands." It accomplishes this goal by reducing single family large lot sprawl and encouraging mixed use urban core housing. In so doing the CISGP is more in line with the goals of the PCGP and the DEIR is out of sync with the PCGP goals. Another stated goal of the CISGP missing from the DEIR is Regional Housing Balance: "Balance the scale of Placer's affordable and achievable housing options so the ratios better reflect Placer County residents. Incorporate equity by design to make desirable living places for all income levels." The Exclusive Comparison: Summary Stats Report on page 50 of the CISGP compares the housing mix between the SAP and the CISGP. The CISGP provides a superior

housing mix for the future workforce in the south Placer area while also reducing the negative environmental impacts that are in conflict with the PCGP. For these reasons the County should recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan as the environmentally superior alternative.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.3-2: Construction emissions of criteria air pollutants and ozone precursors Significant and unavoidable

The DEIR lists a litany of mitigation that is required of developers to reduce impacts to a less than significant level. Who will enforce these mitigation measures, which are very detailed? Will the existing County staff be responsible for this oversight? I have seen mitigation measures go unenforced in other projects due to lack of oversight by Placer County, oversight that should have been done to enforce compliance.

Will the County employ biologists, hydrologists, cultural anthropologists and other trained scientists to ensure that mitigation measures are implemented and monitored in perpetuity? How much time will be required to monitor all these mitigation measures and at what cost? If the County proposes to allow developers to enforce County mandated mitigation measures, please describe how this work will be monitored by the County and what mechanism is in place to monitor for mitigation performance and to remedy false or failed mitigation. This enforcement should not be citizen complaint driven. I had to personally document grading violations at the Winchester Estates development and provide that documentation to the County before fines were imposed and an end was put to the violations. That should not be the way enforcement works. The fines are not sufficient in some instances to provide any deterrent whatsoever.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.2-1: Conversion of Farmland to a nonagricultural use Significant and unavoidable

The DEIR acknowledges that the Project could result in the total conversion of up to 7,295 acres of Farmland. The DEIR includes a mitigation measure calling for farmland to be preserved at a 1:1 ratio.. However, the measure is incomplete, inadequate and unenforceable. Consequently, the DEIR lacks any evidence to support that the mitigation measure will effectively reduce farmland-related impacts. The measure relies on the Placer County Conservation Plan (PCCP) "at such time as it is adopted." The DEIR never explains how the eventual preparation of the PCCP will result in the preservation of Farmland. The mitigation measure relies on a "series of farmland preservation management plans" that will accompany each proposed development project in the SAP and PRSP, but the DEIR fails to describe these plans or explain how their preparation would reduce impacts and loss of farmland. The DEIR says that no additional mitigation would be required "as long as a substantial portion (as determined by the planning director in consultation with the County agricultural commissioner) of the mitigation lands acquired is undeveloped." The DEIR never defines the term "substantial portion." This seems to not be consistent with the mitigation goal of preserving farmland at a ratio of 1:1. What is the economic value of the ecosystem services that these lands provide? Nowhere in the DEIR are these services valued, and only if they are valued can the County make a rational decision regarding whether economic benefit associated with implementation of the SAP and PRSP exceeds the economic value of the ecosystem services provided by the agricultural lands (including agricultural economic production

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Placer County Community Development Resource Agency
Environmental Coordination Services
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value, as well as carbon sequestration, oxygen, habitat etc.) The DEIR states in mitigation measure 4.2.1b that farmland preserved for the purposes of habitat mitigation may be counted toward Farmland mitigation. I take exception to this. Farmland mitigation and habitat mitigation are mutually exclusive. Land used for farming is generally not habitat. Farms can be managed in such a way that migrating birds can use it in the fallow season, for instance in flooded rice fields, but farmland does NOT provide the same habitat for non-migratory animals that non farmland provides, so the last sentence of Section 4.2 should be amended or removed.

In addition to the comments made above, I request the County also recirculate the DEIR to allow full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan. The CISGP is environmentally superior to the proposed project and meets County objectives as set forth in the DEIR. CEQA Guidelines describe the circumstances that require re-circulation of a draft EIR. Such circumstances include: (1) the addition of significant new information to the EIR after public notice is given of the availability of the DEIR but before certification, or (2) the draft EIR is so "fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded." CEQA Guidelines § 15088.5. The DEIR fails to accurately estimate the environmental impacts and asserts that mitigation measures that are not feasible will mitigate impacts. The project description contains so many variables that it becomes impossible for anyone to make an accurate assessment of the environmental impacts. County will need to prepare a revised EIR that includes substantial new information.

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

Scott Johnson
15215 Bancroft Road
Auburn, CA 95602
530-878-1566
scottj@johnsonpianoservice.com