

Ms. Shirlee Herrington

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**Email: [sherring@placer.ca.gov](mailto:sherring@placer.ca.gov)**

Re: Sunset Area Plan/Placer Ranch Specific Plan DEIR Report - State Clearinghouse No. 2016112012, Vol. 1&2

In reviewing the December 2018 Draft Environmental Impact Report (DEIR) for the Sunset Area (SA) Plan and the Placer Ranch Specific Plan (PRSP) areas, I have a number of concerns. Review is in accordance with the California Environmental Quality Act ("CEQA") and Public Resources Code, Section 21000, et.seq. CEQA requires the County address and fully mitigate the effects of the plan upon public health and natural resources, etc. Placer County used Ascent Environmental company to gather data and methodology used in your Tables. However, upon review, the DEIR reveals over 60 significant and unavoidable impacts in almost every category. Negative impacts will impose serious consequences upon public health, air quality, housing, wildlife, and mobility in the proposed Placer Parkway transportation systems if this plan were to go forward as presented in the DEIR. (See Exhibit 1-2 Proposed PRSP Land Use Plan)

In addition, implementation of the project would require conversion/loss of Farmland (Prime, Farmland, Farmland of Statewide or Local Importance or Unique Farmland) to nonagricultural use. This project could result in the total conversion of over 7,295 acres, which would be a significant loss. Mitigation has been identified that requires an option for preservation of Farmland at a 1:1 ratio, or to mitigate in accordance with the PCCP at such time it is adopted, the mitigation would only partially offset the direct conversion of Farmland in the project area. This approach would not create new Farmland to replace Farmland that is lost , AND no additional mitigation is possible.

Population/Employment/Residential Impacts in Specific Plan Areas:

The DEIR, is a large draft document that will serve as a guide to growth of over 8,047 acres of land located in the western portions south Placer County. A specific plan, the Sunset Area (SA) Plan located within the City of Roseville and surrounding many existing neighborhoods where a future buildout of (yet undetermined) Sacramento State college campus is expected. The college campus combined with surrounding land uses projects an increase in student population of up to 30,000 students at buildout. A regional retail district is included in SA which is twice the size of the Galleria, Fountains,

and adjacent box stores combined; and will compete with existing retail in Lincoln, Rocklin and Roseville. The inclusion of more retail will result in low paying wage jobs that will not support the costs of housing and accompanied lack of transit alternatives in this project will cause unwarranted vehicular congestion and negative impacts upon air quality. The DEIR offers no alternative transit opportunities for students and residents to ameliorate the negative and significant impacts of this project upon public health.

Housing alternatives are not fully mitigated in the DEIR. The location of SA area plan in Lincoln/Rocklin includes the addition of 5,636 low density housing units to be built within 1000 feet of Western Regional sanitation plant/Landfill facility with no adequate buffer from odor, nor mitigation to better the expected negative health consequences upon public. Landfill and Buffers: (See Land use 4.10.1) which allows residential development as close as 1000 feet and suspected odors will affect public health. According to the DEIR (Section 4.3-5), the Western Placer Waste Management Authority is actively engaged in yet incomplete studies concerning odors and mitigation of such the nature, and effectiveness of studies or strategies are as yet unknown, no quantifiable thresholds of significance for odor impacts is offered in the DEIR, and no existing fee program or other mechanisms is contemplated in order to fund the costs of odor mitigation in the DEIR. This impact would be significant upon the public health if not fully mitigated in the DEIR.

#### Transportation and Traffic and Air Quality

Placer Parkway (PP): A Multi-land expressway included in the plan offers no other transit alternative that reduces expected increase in CO<sub>2</sub> emissions from increased vehicular traffic upon local project roadways. Such an increase in traffic will negatively affect air quality standards imposed by the California Air Resources Board (ARB) with no alternative transit mentioned in the DEIR. PP creates significant roadway construction and right of ways in the planning areas; noise, air quality are considered unavoidable and significant. Long-term emissions exceed maximum allowed under the ARB guidelines with no off-site mitigation plan and significant/unavoidable effects upon public health. Toxic air contaminants will exist within 500 feet of Hwy 65 which currently experiences up to 100,000 vehicle trips per day. Hwy 65 will be congested with at least 895,317 new daily vehicle trips per day (this does not include surrounding freeways I-80 and I-50 which will connect to the proposed Placer Parkway). Significant negative impacts need to be fully mitigated to avoid serious impacts of bad air quality upon Placer residents.

#### **Environment/Land**

The DEIR does not complete studies of the cumulative and undesirable impacts upon local species (reptiles, birds, migration, habitat, swainson hawk, etc.) no existing alternative no mitigation study fully addresses the effects upon the loss of 7,297 acres of farmland, species, fauna/flora, and vernal pools as per CEQA Guidelines section

15082(a) (1) will require specific mitigation studies not mentioned in the DEIR. The most significant effects are shown in Table 4.2-1 DEIR as farmland is proposed to be converted to non-ag use, a significant impact upon farmland production for the Placer/SACOG region.

Water Quality:

In the DEIR, under the SAP and the PRSP Plan, storm water runoff from Auburn Ravine and Pleasant Grove Creek, all nearby watersheds lack a strong CEQA analysis on the impacts of water runoff downstream, including viable mitigation and unavoidable significant impacts of adjacent areas (unincorporated) outside of the county boundaries. Therefore, the DEIR is not taking into consideration the effects of the combined watersheds which may have a significant negative impacts upon water runoff in our Placer communities upon full buildout of the project plan areas.

I ask that DEIR be revised to include alternative plans to mitigate significant and unavoidable impacts upon public health and the loss of over 7,297 acres of Farmland. I also request the County consider alternative plans for this project that induces quality land use, transit and smart growth for the project and surrounding areas should it go forward. Please consider the Citizen Initiated Smart Growth Plan created by the Alliance for Environmental Leadership. Please revise the DEIR and recirculate to the public for further review and consideration.

Please provide your written response to the address stated below.

Respectfully submitted,

Sincerely,

Delana Ruud  
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February 22, 2019