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February 22, 2019

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Submitted by e-mail to: cdraecs@placer.ca.gov

Re: 1) "December 2018 Public Review Draft Sunset Area Plan"
2) "December 2018 Public Review Draft Placer Ranch Specific Plan" that is apparently the same thing (but I am not sure) as the "Placer Ranch Specific Plan Development Standards, Design Guidelines Public Review Draft – December 18, 2018"
3) DEIR NOA December 18, 2019, SCH No. 2016112012

Dear Ms. Chavez,

Sierra Club Placer Group thanks Crystal Jacobsen for the excellent February 14, 2019 staff report and presentation about and of the Draft Sunset Area Plan Draft Placer Ranch Specific Plan Draft Environmental Impact Report at the Placer County Planning Commission meeting. These Two Plans update the 1994 Sunset Industrial Area Plan that was an update of the 1980 Sunset General Plan.

As far as we can tell, the area of the plans in question has not been developed as a result of the 1980, 1994, or 2018 plans that have not been implemented during this 38-year period.

<u>Comment period and time per person limited for the DEIR by the Planning Commission Chair[1]</u>

Sierra Club notes that the December 2018 Draft Sunset Area Plan, the December 2018 Draft Placer Ranch Specific Plan that may be the same as the December 18, 2018 Placer Ranch

[1] The Planning Commission Chair Jeffery Moss who is appointed by Supervisor Kirk Uhler, makes no effort to guide Commission members toward consensus, doesn't display interest in the Commission's planning functions, and regularly leads applicants to believe that requirements don't apply to them that do.

Specific Plan Development Standards/Design Guidelines (the "Two Plans") were not introduced or described at the at the February 14 Planning Commission hearing. Practically speaking, the DEIR and environmental impacts are so voluminous that to focus only on the DEIR at the hearing might seem reasonable.

But there was little semblance of logic at the event. Comments were limited by the Chair to three minutes for individuals and five minutes for organizations, and the demonstrated that his Chair's purpose had nothing to do with having sitting Planning Commission members present for a meaningful hearing, one where they might develop some suggestions and inquiries or question to speakers and conversation amongst themselves that might lead the to shape suggestions for Planning staff preparing responses to commenters.

Because of the uncertainty about when comments were to be, I inquired to Planning about when comments may be made on the Two Plans. **Comments were solicited in the past on the plans, and that comments on the plans as well as the DEIR may be made through the time of the final adoption hearing on the plans, including at the February 14 hearing.**

Instead, at the hearing, the Planning Commission Chair repeatedly directed that comments only could be made about the DEIR. This was stated a couple of times without explanation, arbitrarily, without making sense, suggesting an effort to undermine public participation. The failure to understand the purpose of Planning Commission hearings and the Planning Commission's role, and ignoring the purpose of public hearing and written input to Planning Commissioners, Planning, the other Planning Commissioners, the Board of Supervisors, and other project reviewers and decision making agencies is evident.

Commenters out of time were allowed to finish a thought. However, there was no inquiry about how much more time someone might need or if people had covered what they believed was necessary.

Unfortunately comments the public is not allowed to make are not responded to.

Most unfortunate of all, the Chair's directive limits and perhaps eliminates the Commission's engagement with action on, or hearing comments about its powers and duty to protect the public health, safety and welfare.

Hearings are needed on the DEIR where plan comments are entertained, and on Two draft plans. See the attached first notice page and Two Plans cover pages.

<u>This plan should not proceed until a Placer County Municipal Services Review (MSR) is completed for all County unincorporated territory. Existing City and other special districts MSRs should be completed for this and all other pending and proposed unincorporated new County-city and other developments.</u>

The Plans and DEIR and response to the DEIR by the City of Roseville reveal (a) a massive effort by the County to get into the government business of providing all or some municipal services in unincorporated territory, and (b) for this plan, great or potential service impacts and demands on neighboring or nearby Roseville, Rocklin and Lincoln.

Placer County already has the major new unincorporated County-City now being constructed remotely from existing County infrastructure and municipal services, the 14,000 or more unit Placer Vineyards. This area has virtually no county service buildings including human services. Some services will probably come from Sacramento County. However, the County has major bridge building projects over two creeks to serve Placer Vineyards area alone; these are for roads that feed to Sacramento County such as to Watt Avenue. Major Baseline Road improvements are planned for this area and other developments near Baseline.

One new big city serving near County Post Office namely Placer Vineyards, is enough until a county wide MSR is completed.

The Sunset Industrial Park was within the Roseville Sphere of Influence (SOI: the area identified for future growth of cities and districts, but not schools) by the Placer County Local Agency Formation Commission (LAFCO). All or much of the Placer Industrial Area Plan was in Roseville until the County asked Roseville for the Industrial Park to be removed from the Roseville Sphere of Influence. The Roseville Final MSR of May 12, 2010 covered this area.

A LAFCO Resolution removed Sunset Industrial Park from the Roseville SOI and the Reason Farms SOI was added to Roseville.

We are not aware that LAFCO required the County to prepare a MSR for the Sunset Industrial Plan Area before making the SOI change. Whether it did or not, a County Wide all unincorporated territory MSR including review is needed that includes Placer Vineyards, Placer Industrial Plan Area, Riolo Vineyards Specific Plan. This area has Roseville Rail Yard pollutant load and health contours that need assessment), Bickford Ranch, Toad Hill Ranches #1, Martis Valley West Specific Plan, Forest Ranch, and so on.

<u>Because there is no alternative to fixed transit and passenger rail in South County north of I-80, we need to plan for this now before moving ahead with the two Plans. Fixed transit and rail passenger systems need be planned and designed first with boulevard and any highway capacity based on it</u>. (E.g., Impacts 4.14-6, 4.14.7, 4.14-9, 4.14-10, 4.14-22, 4.14-23, 4.14-25. Because the Two plan areas seem to be primarily intended to generate employment opportunities, the fixed transit hub absence with significantly higher density around it for all income level housing, is at minimum outdated, not to mention anomalous.

The north end of the traffic mass now and in the future begins and ends at Lincoln (e.g. it does not go north to Wheatland that has about 20,000 vehicles and fewer daily. Most people who have to go one way go the other way north to south east to west. Meta studies show that Highway expansion will only create more traffic while not reliving congestion. Six SR 65 lanes to

Lincoln will not solve traffic congestion; probably not even eight lanes and the highway corridor could be a fixed transit route. These two plans need to be part of planning for this now. There are a number of alternatives.

The Two Plans area must be considered along with needs of the rest of South County, and not in advance of it. The Sierra Club is opposed to widening SR 65, the $400 million I-80/SR interchange and Placer Parkway. These proposals are antiquated and will be more so with fixed transit and passenger rail development. We have never opposed the current SR 65/I-80 viaduct safety interchange improvements. See the attached Highway capacity Policy Brief and map.

Placer County disregarding state law that protects agricultural and forest management lands that are voluntarily put under strict regulation by private landowners. This is a key part of an attack by the County on our farm, ranch and tree farm businesses and families. E.g., Impact 4.1-2.

Williamson Act contracts have been illegally cancelled by the County. At least three or more and perhaps more of the County's 16 Timber Protection Zone properties with houses that pay as little as around $100 annually to the County in taxes based on forest management.

The two Plans are in the Placer County Conservation Plan area. The PCCP needs to move forward significantly before the Two Plans are implemented.

Potential conflict of interest and conflict in the use of County funds for this project application for a Placer County project made to itself, which project and DEIR it prepares itself and approves itself, and in addition which expenditures also benefit private landowners in the Two Plans areas and consultants the County has hired for the project who previously did the same or similar work for developers of the area in the past

We assume that the County has addressed and resolved questions about how limiting public input, approving its own projects, resolving conflicts of interest and so on will benefit developers and landowners, is permissible, and is not misuse of public funds. Mechanisms and policies may be in place to prevent conflicts of interest, and prevent use of public funds for private benefit. Having a wall between public organization project proponents and decision makers may be a solution to conflicts of interest.
For solving part of these problems may be based on taxpayer oversight enablement described in California Code of Civil Procedure 526a.

> **526a.**
> (a) An action to obtain a judgment, restraining and preventing any illegal expenditure of, waste of, or injury to, the estate, funds, or other property of a local agency, may be maintained against any officer thereof, or any agent, or other person, acting in its behalf, either by a resident therein, or by a corporation, who is assessed for and is liable to pay, or, within one year

before the commencement of the action, has paid, a tax that funds the defendant local agency, including, but not limited to, the following:

(1) An income tax.

(2) A sales and use tax or transaction and use tax initially paid by a consumer to a retailer.

(3) A property tax, including a property tax paid by a tenant or lessee to a landlord or lessor pursuant to the terms of a written lease.

(4) A business license tax.

(b) This section does not affect any right of action in favor of a local agency, or any public officer; provided, that no injunction shall be granted restraining the offering for sale, sale, or issuance of any municipal bonds for public improvements or public utilities.

(c) An action brought pursuant to this section to enjoin a public improvement project shall take special precedence over all civil matters on the calendar of the court except those matters to which equal precedence on the calendar is granted by law.

(d) For purposes of this section, the following definitions apply:

(1) "Local agency" means a city, town, county, or city and county, or a district, public authority, or any other political subdivision in the state.

(2) "Resident" means a person who lives, works, owns property, or attends school in the jurisdiction of the defendant local agency.

In addition to the factors above, Sierra Club Vision for South County includes:

- Engaging ecological and physical sciences before any new plan is a proposed, workshopped and adopted, and before each project is located, and designed,
- Maintaining remaining greenbelt areas between Roseville and Lincoln,
- In the city and suburbs, agriculture, community gardens and nature in the city,
- All income housing including moderate and low income housing with that has rare, if any use of in lieu fees,
- Infrastructure, commercial industrial, housing and other entitlements and key factors meet a defined presumption that demand exists for them,
- All residents, property owners and the public at large can sign up to be informed about each government level involvement in the area, and
- That the best source of services, whether County, city of special district, provision of municipal services is evaluated through comparing Municipal Service Reviews for each entity in the area and choosing the best source of them.

- Taxpayers elsewhere in the County do not pay for of subsidize municipal services that they do not benefit from.
- That developers pay up front for improvements, not later after tax payers have footed the bill first.

Conclusion: The place to start instead of this proposal and the hearing last week is with new public workshop review of, (a) the planned to, "A Citizen-Initiated Smart Growth Plan," compared to (b) this resuscitated two Plans relic that is pleased to and planned planned to would be enabled and invited by wasting public highway funds.

$400 million alone on the SR 65/I-80 interchange is proposed in order to, (a) incentivize developers, and (b) attract drivers to the 15-mile Proposed Placer Parkway to Sutter County that would pull drivers through the I-80/SR 64 interchange and up SR 65 to the current Whitney Ranch parkway. Incomplete interchange.

Respectfully,

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Placer Group Sierra Club
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SUNSET AREA PLAN & PLACER RANCH SPECIFIC PLAN

On December 18, 2018 Placer County released a Draft Environmental Impact Report (DEIR) for the Sunset Area Plan /Placer Ranch Specific Plan. The public review period for the DEIR will run from December 18, 2018 through February 22, 2019. The DEIR can be found at this link.

The Placer County Planning Commission will be conducting a meeting on February 14, 2019 to accept comments on the DEIR. The public meeting will begin at 10:00 a.m.; however, the proposed project is not time certain. Please refer to the meeting agendas at this link up to 1 week prior to the meetings for updated information.

In addition to the DEIR, Placer County has also released Public Review Drafts of the Sunset Area Plan and Placer Ranch Specific Plan.

December 2018 Public Review Draft Sunset Area Plan

December 2018 Public Review Draft Placer Ranch Specific Plan

Placer County
Community Development Resource Agency

Sunset Area Plan

Public Review Draft | December 2018

PLACER Ranch

SPECIFIC PLAN
DEVELOPMENT STANDARDS
DESIGN GUIDELINES

PUBLIC REVIEW DRAFT

October 2015

National Center for Sustainable Transportation

POLICY BRIEF

Increasing Highway Capacity Unlikely to Relieve Traffic Congestion

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Issue

Reducing traffic congestion is often proposed as a solution for improving fuel efficiency and reducing greenhouse gas (GHG) emissions. Traffic congestion has traditionally been addressed by adding additional roadway capacity via constructing entirely new roadways, adding additional lanes to existing roadways, or upgrading existing highways to controlled-access freeways. Numerous studies have examined the effectiveness of this approach and consistently show that adding capacity to roadways fails to alleviate congestion for long because it actually increases vehicle miles traveled (VMT).

An increase in VMT attributable to increases in roadway capacity where congestion is present is called "induced travel". The basic economic principles of supply and demand explain this phenomenon: adding capacity decreases travel time, in effect lowering the "price" of driving; and when prices go down, the quantity of driving goes up.[1] Induced travel counteracts the effectiveness of capacity expansion as a strategy for alleviating traffic congestion and offsets in part or in whole reductions in GHG emissions that would result from reduced congestion.

Key Research Findings

The quality of the evidence linking highway capacity expansion to increased VMT is high. All studies reviewed used time-series data and sophisticated econometric techniques to estimate the effect of increased capacity on congestion and VMT. All studies also controlled for other factors that might also affect VMT, including population growth, increases in income, other demographic factors, and changes in transit service.[2]

Increased roadway capacity induces additional VMT in the short-run and even more VMT in the long-run. A capacity expansion of 10% is likely to increase VMT by 3% to 6% in the short-run and 6% to 10% in the long-run. Increased capacity can lead to increased VMT in the short-run in several ways: if people shift from other modes to driving, if drivers make longer trips (by choosing longer routes and/or more distant destinations), or if drivers make more frequent trips.[3,4,5] Longer-term effects may also occur if households and businesses move to more distant locations or if development patterns become more dispersed in response to the capacity increase. One study concludes that the full impact of capacity expansion on VMT materializes within five years[6] and another concludes that the full effect takes as long as 10 years.[7]

Capacity expansion leads to a net increase in VMT, not simply a shifting of VMT from one road to another. Some argue that increased capacity does not generate new VMT but rather that drivers simply shift from slower and more congested roads to the new or newly expanded roadway. Evidence does not support this argument. One study found "no conclusive evidence that increases in state highway lane-miles have affected traffic on other roads"[8] while a more recent study concluded that "increasing lane kilometers for one type of road diverts little traffic from other types of roads".[9]

Increases in GHG emissions attributable to capacity expansion are substantial. One study predicted that the growth in VMT attributable to increased lane miles would produce an additional 43 million metric tons of CO_2 emissions in 2012 nationwide.[10]

Capacity expansion does not increase employment or other economic activity. Economic development and job creation are often cited as compelling reasons for expanding the capacity of roadways. However, most studies of the impact of capacity expansion on development in a metropolitan region find no net increase in employment or other economic activity, though investments do influence where within a region development occurs.[11, 12]

Conversely, reductions in roadway capacity tend to produce social and economic benefits without worsening traffic congestion. The removal of elevated freeway segments in San Francisco coupled with improvements to the at-grade Embarcadero and Octavia Boulevards has sparked an on-going revitalization of the surrounding areas while producing a significant drop in traffic.[13] Many cities in Europe have adopted the strategy of closing streets in the central business district to vehicle traffic as an approach to economic revitalization,[14] and this strategy is increasingly being adopted in cities the U.S., from New York City to San Francisco.

Further Reading

This policy brief is drawn from the "Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions" policy brief and technical background memo prepared for the California Air Resources Board (CARB) by Susan Handy (University of California, Davis) and Marlon Boarnet (University of Southern California), which can be found on CARB's website along with briefs and memos on 22 other land use and transportation strategies that impact vehicle use and GHG emissions. Website link: http://arb.ca.gov/cc/sb375/policies/policies.htm

[1] Noland, R.B. and L.L. Lem. (2002). A review of the evidence for induced travel and changes in transportation and environmental policy in the US and the UK. *Transportation Research* D, 7, 1-26. http://bit.ly/1jZbl1E

[2] Noland, R.B. and L.L. Lem. (2002).

[3] Noland, R.B. and L.L. Lem. (2002).

[4] Gorham, R. (2009). Demystifying Induced Travel Demand. Sustainable Urban Transport Document #1. Transport Policy Advisory Services on behalf of the Federal Ministry of Economic Cooperation and Development, Bonn, Germany. http://bit.ly/1MszHfq

[5] Litman, T. (2010). Generated Traffic and Induced Travel: Implications for Transport Planning. Victoria Transport Policy Institute. http://bit.ly/1WXC258

[6] Hansen, M. and Y. Huang. (1997). Road Supply and Traffic in California Urban Areas. Transportation Research A, 31(3), 205-218. http://bit.ly/1ZyLO0k

[7] Duranton, G. and M.A. Turner. (2011). The Fundamental Law of Road Congestion: Evidence from US Cities. American Economic Review, 101, 2616-2652. http://bit.ly/1MszTeD

[8] Hansen and Huang. (1997).

[9] Duranton and Turner. (2011).

[10] Handy, S. (2005). Smart Growth and the Transportation-Land Use Connection: What Does the Research Tell us? International Regional Science Review, 28(2): 1-22. http://bit.ly/1NCeeSP

[11] Handy, S. (2005).

[12] Funderberg, R., H. Nixon, M. Boarnet, and G. Ferguson. (2010). New Highways and Land Use Change: Results From a Quasi-Experimental Research Design. Transportation Research A, 44(2): 76-98. http://bit.ly/1LqYhfD

[13] Cervero, R., J. Kang, and K. Shively. (2009). From Elevated Freeways to Surface Boulevards: Neighborhood and Housing Price Impacts in San Francisco. *Journal of Urbanism*, 2(1), 31-50. http://bit.ly/1LF8eSq

[14] Hajdu, J.C. (1988). Pedestrian Malls in West Germany: Perceptions of their Role and Stages in their Development. *Journal of the American Planning Association*, 54(3). 325-335. http://bit.ly/1LqYnUy

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The ARSP is located between the West Roseville Specific Plan to the southeast, the Al Johnson Wildlife Area to the southwest and the Creekview Specific Plan to the south (Figure 2.2; Regional Location Map). The Placer Ranch area is located to the east.

Placer Parkway, a proposed six lane regional transportation facility, traverses the site. At its ultimate build out, Placer Parkway will run from Highway 65 in Lincoln to Highway 99.

Unincorporated Placer County is located to the northwest, including agriculturally-zoned property to the west, and an existing rural residential area referred to as Toad Hill Ranches #1 to the north. Existing West Sunset Boulevard, a two-lane rural County road is located adjacent to the northern boundary of ARSP.

At the time of specific plan approval, the ARSP was within unincorporated Placer County.

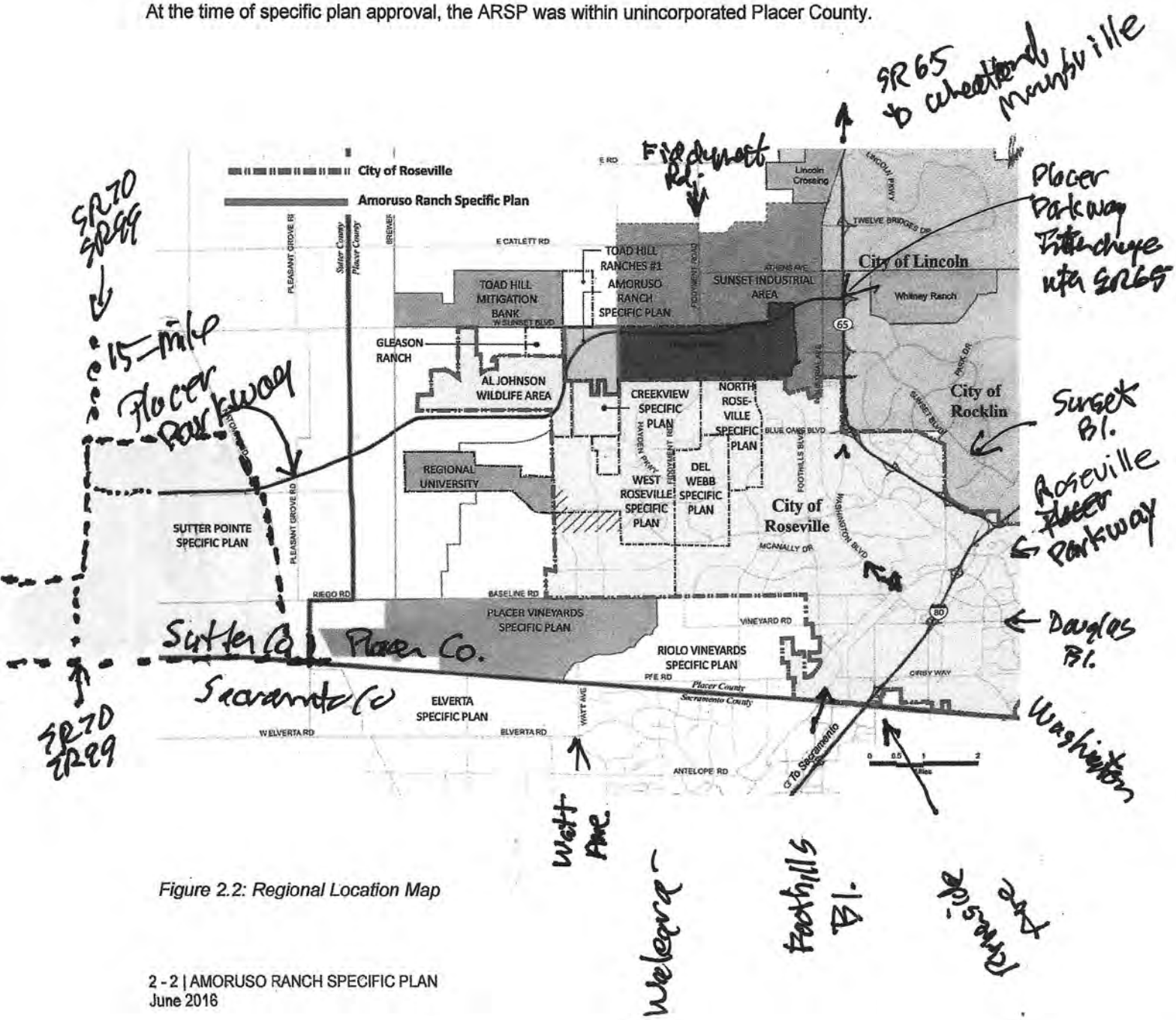

Figure 2.2: Regional Location Map