

LAW OFFICE OF  
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February 22, 2019

Ms. Shirlee Herrington  
Environmental Coordination Services  
County of Placer  
Community Development Resource Agency  
3091 County Center Drive  
Auburn, CA 95603

Re: Draft Environmental Impact Report for the Sunset Area Plan and Placer  
Ranch Specific Plan (State Clearinghouse Number 2016112012)

Dear Ms. Herrington:

This office represents Brookfield Sunset, LLC ("Brookfield"), developer of the Amoruso Ranch Specific Plan ("ARSP") in the City of Roseville, immediately adjacent to the western boundary of the proposed Placer Ranch Specific Plan ("PRSP"). For nearly the past 20 years, Brookfield has worked with the PRSP property owner, or various applicants working on behalf of that property owner, as the two specific plan areas were working their way through the entitlement process. That collaboration has covered a broad range of areas, from roadway connections, to utility connections and infrastructure sizing, and to major regional infrastructure facilities such as the alignment of Placer Parkway. In fact, the significant work that Brookfield did nearly a decade ago with various federal and state resource agencies on the preferred alignment for Placer Parkway through the ARSP helped define a sharply reduced cross-section of such roadway through the PRSP, benefitting both the PRSP and the Sunset Area Plan as a whole.

Brookfield has cooperated with the PRSP property owner and various applicants in an effort to make the transition from one plan area to the other relatively seamless for residents, employees and visitors of both plan areas, while not burdening one plan area with the impacts of the other. Brookfield submits these comments herein in an effort to

seek clarification or to make sure the analysis in the above-referenced DEIR adequately covers the topics being studied as they might pertain to impacts to the ARSP.

### Chapter 3 – Project Description

1. Page 3-58, PRSP Drainage System, second paragraph: The wording “Although the 200-year, 24-hour event would not be attenuated” does not appear to be correct and is not consistent with the Storm Drainage Master Plan for the PRSP.
2. Page 3-60, PRSP Drainage System, last paragraph in section: Would the relocation of the 10.9 acre-feet of retention capacity associated with the Nichols Drive Industrial Park have any impact on peak flows in University Creek, which crosses through the ARSP? It is not clear that this impact was addressed in the hydrology analysis in the DEIR.

### Chapter 4.9 – Hydrology and Water Quality

1. Page 4.9-26, Impacts and Mitigation Measures: One potentially significant hydrologic impact that implementation of the PRSP could have on University Creek would be an increase in the duration of low flows. Low flows would be expected to increase due to increases in impervious area and also from irrigation and other non-storm water flows into drainage systems. These flows could promote excessive vegetation in University Creek which could reduce capacity for conveyance and thereby increase flooding at higher flows. Another potential impact would be increase in the duration of moderate flows that could induce erosion in University Creek. These potential impacts need to be analyzed. As a general comment, it is unclear what, if any, changes in flows/durations occur from development of the PRSP, and how such changes will impact downstream properties as a result of PRSP development.
2. Pages 4.9-42, -43, Mitigation Measure 4.9-4c, second paragraph: The text moves from matching pre-project conditions to peak flows from a discrete storm event, rather than continuous simulation, which transition can be confusing.

### Chapter 4.14 – Transportation and Circulation

1. Pages 4.14-94, -121, Transportation Inputs, Cumulative Impacts to Intersection Operations in Roseville: The PRSP and approved ARSP traffic studies appear to

use the same intersection lane geometrics for the ARSP area. However, there are some possible inconsistencies between the traffic studies for the two plan areas, as while both assume Road B in the ARSP is a 4-lane roadway where it intersects with Road A in the ARSP, the volumes modeled at this intersection in the PRSP traffic study are very small (sometimes zero), and do not appear to match or justify the number of lanes that have been projected for Road B. Specifically, Roads B and D are 4-lane roadways in the ARSP, but only 2 lanes immediately to the east in the PRSP. Nowhere in the DEIR is there discussed where the transition between 2 and 4 lane roadways will occur. Included in such a discussion should be how landscape easements in the ARSP, as well as how Class 1A sidewalks in the ARSP, will transition to the 2-lane roadway cross-sections in the PRSP.

#### Chapter 4.15 – Utilities

1. Pages 4.15-64, -65, Cumulative Impacts 4.15-12, 4.15-13, Appendix F, Figure 4-1: The PRSP water system layout proposes 12-inch connections (interties) with the City of Roseville system within the ARSP. The two emergency intertie connections occur at Road B and Road D in the ARSP. Both of these proposed connection points are currently proposed as 24-inch water transmission mains within the ARSP. The discrepancy in pipe sizes needs to be explained in the DEIR.
2. Page 4.15-51, Mitigation Measure 4.15-4b: The text says in the significance determination paragraph after mitigation that “the capacity expansion [for the PGWWTP] would be required prior to construction [sic] of development within the net SAP and PRSP areas.” The question left unanswered is what happens to additional capacity from expansion of the PGWWTP that other projects are financing. Does the PRSP get to utilize expanded capacity that others have paid for to serve their own projects when the PRSP goes to develop if the PRSP has not paid its fair share of the expansion needed to serve the PRSP?
3. Page 4.15-52, Impact 4.15-5, Construction of Stormwater Drainage Improvements: It is not clear what the impact on other projects relying on Reason Farms would be from the infrastructure that the PRSP needs to mitigate its impacts.
4. Appendix F, Page 3.3-16: The proposed PRSP water reliability and emergency interties to the City of Roseville system are proposed to include the following at

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each connection: bidirectional water, isolation valves, and telemetry to both PCWA and the City of Roseville. It should be clearly stated that these interties will be located in the PRSP. In addition, there is a pressure differential that occurs in these location of approximately 13 psi under maximum day conditions (lower pressure on the Roseville side), and varies under other scenarios. Thus, a pressure regulating/sustaining valve may be required and should be determined during system design. Intertie design should be reviewed and approved by the City of Roseville as well as by Placer County.

We hope that the County finds these comments helpful. Thank you for the opportunity to comment.

Very truly yours,

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Cc: Brookfield Sunset, LLC