February 12, 2019

Chair and Members of the
Placer County Planning Commission
3091 County Center Drive #140
Auburn, CA 95603
Attn: Shirlee Herrington, Environmental Coordinator (sherring@placer.ca.gov)

Dear Ms. Herrington and Chair and Members of the Placer County Planning Commission:
I have reviewed the County's Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County:

Does not meet Objectives
In Placer Ranch Specific Plan Primary Objectives (6-3), the DIER states that, "development of the Placer Ranch community is designed to function as a stand-alone project *that is consistent with the goals and policies of the Sunset Area Plan*." Placer Ranch undermines several objectives of the Sunset Area Plan.

Retention of Unique Land Supply: Placer Ranch subdivides several of the largest parcels in the SA to create small single-family home parcels, the type of subdivisions that diminish long-term value and foreclose unique development opportunities. Changing the landfill buffer to accommodate Placer Ranch further undermines retaining the unique land supply, because the buffer staves off residential sprawl, which has many other opportunities of growth.

Housing Diversity: Placer Ranch fails to provide housing types not otherwise available by minimizing the amount of multifamily housing and maximizing the region's most common type- the single family home. Multifamily housing is a blanket term covering many building typologies, including mid-rise residential, garden apartments, standard and urban multifamily podiums, urban town-homes, live-work units, suburban town homes, condos and apartments. The little multifamily housing PR includes lacks diversity and promotes inequality by placing the farthest from the schools, closest to major road ways, and isolating it from other types in a way that will stigmatize it as a low income area.

Economic Innovation and Creativity: Placer Ranch does not support innovation or creativity, simply by creating unwalkable and disconnected communities. The business world acknowledges creativity and innovation coming from the "collision rate" or the amount of interactions possible to a single person while on a walk. The Walk Report in the CISGP gives the SAP a very low walkability score, meaning that people will be reliant on cars to get around, and thus isolated from each other. Only 9% of residences will be within a 15 minute walk to a job site, and only 30% will be within a 10 minute walk of restaurants, both an indicator of community social life. Please see the Walk Report analysis for the CISGP for an example of good walkability ratings.

Promotion of Active Transportation: The SAP, including PR, fail to fulfill the objective to accommodate walking for functional purposes. While they include complete street designs, the layout will not achieve active transportation because it does not place destinations within reasonable walking distance. Americans are willing to walk 15 minutes to get to school, get only 17% of residents will live within 15 minutes walking distance of school. Americans will walk 15 minutes to get a hospital, yet only 23% of residents will be within range. Americans will walk 10 minutes to get a restaurant, yet only 30% will be within range of one. Work commutes are even worse- only 9% of residents will be within a 15 minute walk of a job site. This problem stems from the zoning design and an analysis must be conducted

to evaluate and provide reasonable certainty that active transportation is am attractive transportation option.

Placer Ranch also struggles to meet its own objectives.

Provide a Balanced Land Use Mix: The priority of Placer Ranch is low-density residential sprawl. All the additions are concessions to meet that end. As a result it does not meet this objective in good faith. In terms of land use per area, Placer Ranch is primarily residential, and with each new draft it increases its percentage of single family residential. The design creates the monoculture scenario we see in Roseville, where communities are designed around town centers or commercial areas, and the commercial area is never built out. Over time, the developer shrinks the commercial areas and builds more residences. In a nation wide study, the property taxes generated from suburbs were too low to support infrastructure maintenance costs over time, bring in only $0.06 - $0.65 per dollar needed. Placer Ranch does not establish reasonable confidence that it will financially support itself. A financial study and projection must be carried out to determine the financial burden put upon the county by the development.

Establish a site for a CSU: There have not been any feasibility studies done regarding the University's location or financial feasibility. Both must be completed before Placer Ranch can establish reasonable feasibility for the formation of a CSU. Merely donating the land does not fulfill the objective. The latest assessed land value for the parcel of which the CSU will be a subdivision was approximately $20 million, while the PCCP mitigation costs are upwards of $40 million. All of the 300 acres are a vernal pool complex, as seen on both the County's vernal pool map and the vernal pool study by Carol Witham and John Vollemar. In addition, the University site is virgin soil, requiring extensive soil engineering, and it is far away from existing utilities, requiring water, sewer, electricity and roads to extended to even reach the edge of the site.

Establish Open Space for Habitat Conservation-Habitat: Placer Ranch seeks to create on-site habitat conservation through open space corridors. These will not protect the biodiversity of the site and defy all scientific research about effective reserves in Placer County and research on grassland species habitat requirements. The research behind the PCCP found that reserves must be at least 200 acres and minimize the perimeter area in order to preserve habitat. The open space corridors in the PR are less than 200 acres and maximize the perimeter through the snaking corridor design. Grassland bird species in PR and SAP forsee the greatest habitat loss of all fauna, loosing 1,195 acres, according to the CISGP's Habitat Conservation Study, utilizing the Nature Conservancy's algorithms. Grassland birds are highly sensitive to changes in their habitat and the introduction of so much as a telephone pole will displace them. They require extensive acreage of grassland open space to flourish. Maintaining their habitat on site is impossible with the development objectives. Instead, the entire ecosystem of the SA will shift from grassland to urban-riparian corridor, the fauna of which have different habitat requirements. For further information, or to see an illustration of the species change, see the CISGP pages 74-77 and 98-101. **Any onsite habitat mitigation must be substantiated by scientific research specific to the grassland ecosystem on site in order to provide reasonable certainty of its success. Both PR and SAP must do this to properly disclose habitat impacts in the DIER and achieve their own objectives. In addition, a study must be done on how to improve riparian habitat on site for the incoming species, as well as address the impacts caused by raccoons and possums.**

Establish Open Space for Habitat Conservation- Drainage: PR does not provide the design detail required for evaluation or any corroborative research to prove with reasonable certainty the effectiveness of open space drainage plan. It fails to address the stream course setback, flood plain, stream width, stream order and meander amplitudes in its drainage design. Stream setback for vernal pool habitat in

Western Placer County has been specifically studied in, "Setback Recommendations to Conserve Riparian Areas and Streams in Western Placer County" prepared for Placer County Planning Department by Jones & Stokes and PRBO Conservation Service in 2005. The study finds that1st and 2nd Order Streams must have setbacks of 98 ft. + floodplain and that 3rd Order and Higher Streams must have 656 ft. + floodplain. In the General Plan, Community Plans, of which PR is a part, can designate their own stream course setbacks. This is important for preserving natural drainage in the SA, because the General Plan stream setbacks are too small for vernal pool drainage systems. To see the distance and learn more about the setback problems and how to address them, please see the CISGP, pages 90-97. **An analysis must be done on the efficacy of the open space drainage plan to preserve natural drainage and quality and quantity of discharge throughout the year at the exist point from the project area. This study must include surface and sub-surface watershed analysis, as the loamy soil over hardpan acts as a slow-release sponge, an effect of which is vernal pools.**

Create a Fiscally-Responsible Plan: This objective has yet to be demonstrated by PR or SAP because the fiscal analysis has not been completed. **This must be completed and available for public review as a part of the CEQA disclosure.**

Foster Sustainable Community Design: Placer Ranch's approach to sustainability is a surface-level bandaid approach, similar to what you would see in a bare bones renovation of an existing community, and as such does nothing to advance long-term sustainability goals. It merely scratches the bare minimum required by law. To achieve this objective, Sustainable Community Design must begin at zoning level, where PR fails to follow the most basic principles of Smart Growth planning, despite calling itself a Smart Growth plan repetitively in it's Dec. 2018 draft. One example of this is that the PR area is 100% open space, while Smart Growth principles first rebuild existing development, then convert brown field sites, then urban infill of green lots, and at a last resort convert open space- not to mention the habitat and agricultural value of the open space Placer Ranch seeks to convert. The CISGP, also a smart growth plan, illustrates the ripple effect benefits of applying smart growth principles at the zoning level. As such it also reveals the opportunities the SAP misses by not addressing sustainability from in land use design. For example, the arrangement of dwelling units in the CISGP reduces annual household emissions by 75%, and water use throughout the plan area by 25%. **Placer Ranch must do a study to compare the impacts and benefits of their design against an average, up to code California Community to prove they are contributing to long-term sustainability.**

Reduce Reliance on the Automobile: There are no indications that Placer Ranch will achieve a reduction in independence on the automobile within its area or the surrounds. In addition to the walk report findings mentioned earlier (CISGP pg. 52), the bus route designed for the PR is a total joke, because it the zoning plan does not allow for the density required to provide the necessary ridership and funding for a reasonable and useful bus service. The support bus rapid transit, residents must live at a minimum density of 9 dwelling units / acre, of which only 12% of residents do. Non-residential uses must have a minimum FAR of 1.0 to have the employee head count to warrant a bus stop, which is 0% of PR. **Placer Ranch must do a study to prove that it can support alternative transit, including walking, biking and pubic transit.**

Enable Blueprint Consistency: Blueprint consistency starts at the land use level, especially since the Blueprint evaluates land use across the greater Sacramento Region. To see the SACOG vision blueprint for the project area, look at CISGP pg. 18-19. It does not include *any* low residential development in the SA. For the SA, it encourages industrial in the south-east with a low density mixed use zone. A large amount of the site remains open space and residential encroaches from the north and south. Since 2004, SACOG has tracked development in relation to the blueprint and created preferred build out scenarios. According to SACOG, single family small lot residential has been building out to capacity at an

unanticipated fast rate. While the Blueprint is not intended to be used to determine use for any particular area, it's purpose is to guide land use in communities. There is no way that increasing the growth area for residential sprawl is in line with the blueprint.

Furthermore, PR treats itself as a stand-alone project, as specified in objective 2. It does not meaningfully interconnect with neighborhoods to its south, but rather merely extends the monoculture of roads and houses.

Falsely Represents Project through Inconsistent Numbers

Several of the figures in Table 6-1, Project Development at Buildout, are inconsistent with the figures in the SAP and PRSP drafts. This is of concern on two fronts, for either the project is misrepresented in the DEIR, or the SAP / PRSP drafts are inaccessible for public review.

1. It lists 2,460 du of Single-Family Residential in the Net SAP Area, yet there are 0 single family residential units in the SAP Plan Draft, for both January and December 2018 versions.
2. It lists 0 du of multifamily residential in the Net SAP Area, yet the housing typologies allowed in the EMU zone includes multifamily dwellings, single room occupancy units and live/work units (SAP Dec. 2018 Draft, pg 158). These two falsities not only falsely portray the distribution of different residential types, but also under represent the total amount of dwelling units by 1,307 (13% of total units). This is outside the realm of reasonable margin of error.
    a. In addition, the written description of the table is inconsistent with the values in the table, such as in the Population and Housing description where it lists 8,094 du instead of 8,096 du.
3. The breakdown of how much each of Retail, Office, Industrial, Innovation Center/R&D, and Entertainment Mixed Use categories take up in the Campus Park and the SAP are not disclosed in the PRSP Dec. 2018 Draft or the Sunset Area Plan Dec. 2018 Draft. Hence, they cannot be publicly verified for accuracy.
4. The accuracy of these values is unlikely, as calculating the square footage breakdown for SAP from the acreage and the FAR min and max creates a range of 30,330,076 to 123,089,670, a difference from the sum of the categories in the table potentially 5 fold.
5. According to PSRP Dec Draft, Public Facilities in the PRSP Area are 43 ac, not 10.3 ac as listed in the table. The total in the table leaves out the elementary school and middle school (32.7 ac).
6. The breakdown of parks/open space and preserve/mitigation areas is also falsely represented. In the PRSP Dec. 2018 draft Section 04-2, the 264.8 ac of Preserve/Mitigation Areas are designated open space, not mitigation.

Failure to Evaluate University Location

There are several glaring problems with the location of the university, firstly health/wellbeing and secondly fiscal responsibility. The university is located within the existing landfill buffer zone and odor will be a consistent and significant problem to the 35,000 people on campus. **How can the impact on these sensitive receptors be quantified?** Possibly through comparison with Elk Grove and the negative effects on residents who live near the waste water treatment plant.

The County's official vernal pool map shows the entire university site as vernal pools. The mitigation fees for the direct effects alone mitigated through the PCCP are more than $40 million. The last assessed value of the parcel the university would be a subdivision of was $20 million. In addition to the outrageous mitigation cost, other avoidable costs such as utility and infrastructure expansion to site and extensive soil engineering will be required. A longstanding notion that this is where the university should

go cannot stand in for proper analysis. **As a public university funded with public dollars, a proper location study and financial feasibility study needs to be conducted.** For an example of another location within the SA for the university that avoids these costs, see the CISGP zoning plan.

Conflicting Vernal Pool Maps

The location of vernal pools effects all greenfield development in the SA. According to Greg Mackenzie, the county's vernal pool map has been made through aggregating many studies. Another map produced by respected vernal pool expert Carol Witham is the result of a study to map all remaining vernal pool habitats throughout the Central Valley in 2014. These two maps have substantial conflicts in the size, shape and density of vernal pool complexes in the SA. Both can be seen on page 108-109 of the CISGP with several differences pointed out. Here is the citation for the Witham map:

> Witham, C.W., R.F. Holland and J.E. Vollmar. 2014. Changes in the Distribution of Great Valley Vernal Pool Habitats from 2005 to 2012. Sacramento, CA. Report prepared for the U.S. Fish and Wildlife Service and Bureau of Reclamation CVPIA Habitat Restoration Program under Grant Agreement No. F11AP00169 with the USFWS.

An onsite vernal pool study over the course of the year must be made for Placer Ranch at this time to effectively evaluate the impacts. Addressing it parcel by parcel after the subdivision has happened *piecemeals* the analysis.

In addition, the two conflicting maps must be reconciled at this stage in order to adequately portray the existing conditions.

Placer Parkway as Traffic Mitigation

Placer Parkway has yet to secure funding to be built and it has also not completed its environmental impact review. As such, it is not a feasible traffic mitigation measure**. A suitable back up plan must be outlined and evaluated in the DIER, as well as the impacts of traffic on hwy 65 and local roads without Placer Parkway.**

Cumulative Impact *on* Expansive Soils

The soil in the SA is of special ecological value. The fluffy topsoil on top of hardpan holds in water through the dry months, slowly releasing its reserves into the creeks. Normal soil has large air pockets, called pores, that allow water and nutrients to move down to plant roots and the water table. Compaction squeezes the air out of the soil and reduces the size of pores, limiting water infiltration, increasing runoff, and decreasing the sponge effect. These factors change plant production and composition and the arrangement of organisms living in the soil within the compacted areas as well as adjacent normal soil areas.

To best protect the existing reserve areas and natural drainage, the natural water flow on top of and in the soil should be maintained and mimicked. Because the soil in the SA shrinks and expands, to prepare the soil for construction it will likely be scraped deeply and compacted with lime or other stabilizers to manufacture the desired structural properties. This requires specialty equipment of a very large size and to eliminate grading complexity, entire parcels will be compacted and shaped by deeply cut roads, drains and overflow ponds.

Such soil preparation is irreversible. We will never be able to tear up the pavement to return it to agriculture land or vernal pool grassland. **Runoff studies must include effects to the watershed, stream habitat quality, and plant life caused by changes in the subsurface water flow.** As percolation through the clay plan is minimal, ground water recharging for the SA happens in the creek beds and areas down stream. **Environmental impacts from stabilizers in the soil must be disclosed.**

In addition, the SAP reduces the above ground carbon stock by 973 metric tons and the soil carbon stock by 39,743 metric tons. Collectively that is 40,715 metric tons, the equivalent of 31,962

passenger vehicles driven per year. (See CISGP Carbon Report, pg 69.)

In addition to my comments, I would request that you also recirculate the DEIR to allow full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan. This Plan is environmentally superior to the proposed project and meets County objectives as set forth in the DEIR. Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County.

Sincerely,

Genevieve Marsh
3144 Manhattan Bar Rd., Auburn, CA 95603
916-316-8061