



Letter
20

phone: 530-885-4920

mailing: P.O. Box 9207 • Auburn, CA 95604 office: 219 Maple St., Suite 200 • Auburn, CA 95603
www.placercf.org

February 20, 2019

BOARD OF DIRECTORS

Larry Welch
Chairman of the Board

Jim Williams
First Vice-Chairman

Ken Larson
Second Vice-Chairman

Sheila Cardno
Treasurer

Ellen MacInnes
Secretary

Pamela Constantino
Immediate Past Chair

Kindra Britt

Guy R. Gibson

Elizabeth Jansen

James Kim

Paul McKenna

Nadder Mirsepassi

Richard Saletta

Timothy J. Sands

Sue Thompson

EMERITUS BOARD

Susanne Baldo

Jeff Birkholz

Jack Briner

Ruth Burgess

Judge J. Richard Couzens

Mary Ann E. Hamilton

Todd Jensen

Bruce A. Lyon

Thomas E. Propp

Kelly C. Richardson

Victor Roumage

Justice Keith F. Sparks (Ret.)

Curtis C. Sproul

H. Ray Yamasaki

Veronica Blake
Chief Executive Officer

Ms. Shirlee Herrington, Environmental Coordination Services
Placer County, Community Development Resources Agency
3091 County Center Drive, Ste. 190
Auburn, CA 95603

RE: Comments- Draft EIR for the Proposed Sunset Area Plan/Placer Ranch
Specific Plan Project

Dear Ms. Herrington:

Thank you for allowing the community to give comment to the above mentioned project. As you know, the County has severe shortage of affordable workforce housing and given the nature and size of this project, affordable housing should be prioritized.

Although high density doesn't necessarily mean affordable, why was the number of high density residential units reduced from the original plan?

The EIR fails to provide a detailed jobs/housing balance analysis that evaluates whether the plan provides sufficient housing to accommodate the salaries of the new workforce in the plan area

The EIR states the plan will comply with the County's requirement of providing 10 percent of residential units in specific plans be affordable But the EIR doesn't provide specifics on how it will implement housing policies B-4, B-6, and B-13. Will the affordable units be spread throughout the different subdivisions or concentrated in one area?

The EIR should clarify that Student housing will not count towards the developments affordable housing requirements

20-1



In-lieu fees should not be permitted for a project of this size and scope. Further, a nexus study to determine fee in lieu has not been adopted by the Board of Supervisors.

The project's impact to affordable housing will be significant and housing element policy should be used as a mitigation measure to help reduce the severity of this impact. As required by Government Code 65454, a specific plan needs to be consistent with the county's general plan. This project should be consistent with other project EIRs in the County.

Given the challenges of constructing affordable housing and the subsidies needed to get units constructed, affordable units should receive priority for access to infrastructure, transit and should not have the additional costs associated with being located in the flood plain.

It doesn't appear that any land has been set aside for future light rail or some form of mass transit (other than bus stops). Which is also necessary to meet the needs of residents in affordable housing.

Is the housing density high enough to support rapid transit?

We appreciate the opportunity to comment.

Sincerely,



Veronica Blake, CEO
Placer Community Foundation
PO Box 9207
Auburn, CA 95604

VB/fd

20-1
cont.

Letter 20	Placer Community Foundation Veronica Blake, CEO February 20, 2019
----------------------	---

- 20-1 The comment questions why the number of high-density residential units was reduced from previous plan iterations and claims the Draft EIR fails to provide a detailed jobs/housing balance analysis to determine whether the new workforce can afford to live within the project area. The comment further questions how Housing Element Policies B-4, B-6, and B-13 would be implemented and requests the anticipated location for construction affordable housing be identified and that an in-lieu fee should not be permitted for projects of this scale. Additionally, the comment requests clarification that student housing does not count toward the project's affordable housing obligations. Finally, the comment suggests mass transit is necessary for affordable housing residents and questions whether the project's density is high enough to support rapid transit.

This comment raises similar issues as comment letter 18. See responses to comment letter 18. Also, a given housing market comprises households with a range of incomes capable of affording a range of housing costs. Housing markets also contain a range of housing typologies (e.g., size; density; tenure; market-rate; subsidized) to meet different segments of demand. Similar to the Sacramento regional housing market, the project is envisioned to contain housing options at various price points thereby providing a range of housing options that could accommodate a range of salaries. These housing options include single-family homes of mixed densities, high-density multifamily homes, student housing, and subsidized affordable housing.

The project is being planned to include a variety of nonresidential land uses, with future employers offering retail, office, and industrial employment opportunities requiring a range of skills and experience. At this time, specific employers and employment opportunities are unknown but it would be necessary for these employers to offer competitive wages to successfully attract employees from the region's labor force.



PLACER COUNTY
SOLID WASTE LOCAL TASK FORCE
Devin Whittington, Chairman

Letter
21

February 13, 2019

Placer County Board of Supervisors
175 Fulweiler Avenue
Auburn, CA 95603

RECEIVED
FEB 19 2019
CDRA

Subject: Sunset Area Plan/Placer Ranch Specific Plan Draft EIR (State Clearinghouse No. 216112012)

Dear Board of Supervisors:

The Solid Waste Local Task Force (SWLTF) was established by the Board of Supervisors in 1990 to advise the Board on matters related to solid waste. The SWLTF is an advisory committee which, among other things, reviews and comments on proposed actions, programs, and facilities that affect the management of solid waste and diverted materials in Placer County. Membership of the SWLTF includes representatives from the cities of Roseville, Rocklin, Lincoln, Auburn, and Colfax, Town of Loomis, two franchise waste haulers, landfill and Material Recovery Facility (MRF) operators, the County Board of Supervisors, County Planning Commission, an environmental group, and the general public.

The SWLTF writes to respectfully provide the Board with the following comments on the Sunset Area Plan/Placer Ranch Specific Plan (Project) Draft Environmental Impact Report (EIR). The Project would modify the existing land use buffer standards that apply to solid waste facilities, potentially allowing residential and commercial uses much closer than currently allowed to the Western Regional Sanitary Landfill (Landfill) and MRF.

As described in detail in Chapter 3, "Project Description", the Project proposes an amendment to General Plan Policy 4.G.11, the purpose of which is to protect landfill facilities from incompatible encroachment. The policy currently requires that "new residential land uses...be separated from the property lines of active and future landfill sites by a buffer of one mile, or 5,280 feet." The proposed policy would allow residential development as close as 1,000 feet to the Western Regional Sanitary Landfill (WRSL) with approval of a specific plan, master plan, or a development agreement with certain requirements. Without a specific plan or development agreement, the minimum buffer zone would be 2,000 feet.

21-1

The sensitive receptors that would be developed within the landfill buffer zone would be:

- 5,827 Family homes
- 1 Elementary school
- 1 Middle school
- 1 State University for 30,000 students

3091 County Center Drive, Ste. 170 – Auburn, CA 95603 – DeWitt Center – (530) 889-6846 – Fax (530) 886-4908

Sunset Area Plan/Placer Ranch Specific Plan Draft EIR (State Clearinghouse No. 216112012)
Placer County Board of Supervisors
Page 2 of 6

The SWLTF has significant concerns with the proposed modification to the buffer zone and urges the County to maintain and enforce existing General Plan Policy 4.G.11 for the reasons outlined in this letter.

The Landfill and MRF are crucial public facilities.

These facilities are owned and operated by the Western Placer Waste Management Authority (Authority) which is a Joint Powers Authority comprised of County of Placer and the cities of Lincoln, Rocklin and Roseville. They provide the primary waste disposal and recycling services for the majority of Placer County. The MRF has been key in enabling Placer County jurisdictions to comply with state laws, such as AB 939, which mandates jurisdictions divert 50 percent of their waste from landfills or face fines of up to \$10,000 per day.

21-1
cont.

Encroaching development could hinder future expansion of Landfill and MRF.

Currently, the Authority is developing future expansion plans for the Landfill and MRF to meet future disposal and recycling needs of the County. The SWL TF asks that you consider this as you approve new specific and area plans in proximity to the landfill. Once incompatible development is in place, it will be considerably more difficult for WPWMA to gain the necessary approvals to expand.

Finding alternative facilities will significantly increase cost impacts on citizens.

If the County is forced to utilize alternative, out of county options for disposal and recycling, it will significantly increase ratepayer costs due to hauling waste longer distances. In addition, complying with extensive new mandates would be difficult as there is a statewide shortage in organics processing facilities and the facilities and programs would be entirely outside local control.

21-2

These concerns are elaborated on in the SWLTF's previously submitted comment letter, dated May 3, 2018, and attached herein.

The current buffer zone was the subject of a court case.

The Task Force strongly requests the County to be mindful of previous litigation regarding the one mile buffer around the landfill. The Placer County General plan was updated in August 2003 and included the one-mile buffer to protect the landfill. The EIR should explain what has changed that enables Placer County to now support a reduction in the buffer whereas they adopted the current one-mile buffer in 2003.

21-3

The following are specific comments on sections of the EIR that we are highlighting for your attention and that support our concerns outlined above:

3091 County Center Drive, Ste. 170 – Auburn, CA 95603 – DeWitt Center – (530) 889-6846 – Fax (530) 889-6809

Sunset Area Plan/Placer Ranch Specific Plan Draft EIR (State Clearinghouse No. 216112012)
Placer County Board of Supervisors
Page 3 of 6

Chapter 4.3 Air Quality

1. Section 4.3.2 Environmental Setting - Odors

Page 4.3-6 – Odors. The SWLTF supports the EIR's acknowledgement of the ways that odor can impact people, e.g. that "a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache)." The SWLTF urges the County to consider that the Project, by bringing land uses in closer proximity to the landfill, will expose the sensitive receptors listed above to these conditions as part of their daily lives.

Page 4.3-8 – Odors Complaint / Notification History. The SWLTF also supports the County's decision to, while not strictly required to do so, evaluate and draw significant conclusions with respect to impacts of existing odor sources on future residents and visitors. Table 4.3-3 in the EIR lists the number of complaints filed due to odors from year 2012-2017 and Exhibit 4.3-1 illustrates where the complaints originated geographically, the vast majority just beyond the one-mile buffer. This visually demonstrates the extent of additional odor complaints that will originate within that area once the buffer is reduced. The SWLTF urges the County to understand the ramifications of this: in addition to the impact on sensitive land uses, additional complaints can result in violations being issued by Placer County Air Pollution Control District (PCAPCD) and other regulatory agencies which could limit or prohibit waste acceptance at the Landfill and/or MRF.

21-3
cont.

Chapter 4.10 Land Use

1. Impact 4.10-2: Consistency and compatibility with the Western Regional Sanitary Landfill

The SWLTF is supportive of, and would like to emphasize, the finding under Impact 4.10-2: Consistency and compatibility with the Western Regional Sanitary Landfill, which concluded with a Significant and Unavoidable Impact finding related to consistency and compatibility of proposed land uses, specifically stating that, "Therefore, with implementation of the proposed amendment to the General Plan landfill buffer requirements, the PRSP would bring residential development closer to the WRSL, which would result in an incompatible use with the WRSL." The SWLTF would like to bring attention to this section and advise the County against reducing the landfill buffer which would place family housing, an elementary school, and a middle school or college within the buffer zone. These are incompatible land uses and would cause conflicts with the current landfill operation. The inherent odors from the landfill, MRF, and compost facility, which include handling of food waste, would adversely affect the public's ability to participate in outside activities if these sensitive receptors were allowed to be built in the current landfill buffer zone.

21-4

As noted on page 4.10-15, the EIR acknowledges that the PCAPCD CEQA handbook recommends a screening distance for sanitary landfill odor impacts of one mile from the landfill.

3091 County Center Drive, Ste. 170 – Auburn, CA 95603 – DeWitt Center – (530) 889-6846 – Fax (530) 889-6809

Sunset Area Plan/Placer Ranch Specific Plan Draft EIR (State Clearinghouse No. 216112012)
Placer County Board of Supervisors
Page 4 of 6

Still, the Project proposes to modify the existing land use buffer zone standards that apply to solid waste facilities, potentially allowing residential and commercial uses as close as 2,000 or 1,000 feet, respectively (and potentially as close as 1,000 or 300 feet, respectively, when considered on a project specific basis), to the landfill and MRF. The SWLTF advises the County to heed the PCACD recommendation to maintain a one-mile buffer or explain in the EIR the justification for a reduced buffer.

It is important for the County to understand and acknowledge the ramifications of this land use conflict. As mentioned above, the Authority is developing future expansion plans for the Landfill and MRF to address population increases and meet future disposal and recycling needs of the County. The landfill already receives odor complaints outside the one-mile buffer, as described in the Air Quality chapter of the EIR. The SWLTF asks that you consider this as you approve new specific and area plans in proximity to the landfill. Once incompatible development is in place, it will be considerably more difficult for WPWMA to gain the necessary approvals to expand. Despite the current buffer, the facility receives odor complaints and reducing the buffer standards would increase the number of complaints. Even with mitigation, a certain extent of odors is inherent to solid waste operations, so adequate separation from incompatible uses is necessary to protect the long term viability of critical public facilities. As stated in this section, impacts relative to consistency and compatibility of proposed land uses with the WRSL would be Significant and Unavoidable. The SWLTF agrees with this and recommends against the placement of sensitive receptor development projects in the current buffer zone for the landfill.

21-4
cont.

2. Mitigation Measure 4.10-2: Require odor control measures of specific plans (PRSP Area and Net SAP Area)

Among other things, the Mitigation Measure proposes the following:

Deed Notification

“Require written disclosures to initial and subsequent prospective buyers, lessees, and renters of those properties, particularly residential buyers, with information that their respective properties would potentially be subject to objectionable odors from a known nearby odor source. While this specific action would not eliminate complaints, it may reduce the frequency of complaints by those living or working closest to the landfill.”

21-5

The SWLTF appreciates inclusion of such a mitigation measure, but the language proposed does not preclude a property owner from seeking legal restitution due to odors. The SWLTF recommends that, to the extent legally permissible, the Deed be modified, particularly for parcels within one mile of the landfill, to include language that would prohibit a property owner from litigating against the landfill based on odors.

The SWLTF appreciates all the mitigation measures proposed, but would like to point out that current technologies do not exist to completely eliminate or fully mitigate landfill originated odors. The following WPWMA workshop presentation identifies the odor challenges associated

3091 County Center Drive, Ste. 170 – Auburn, CA 95603 – DeWitt Center – (530) 889-6846 – Fax (530) 889-6809

Sunset Area Plan/Placer Ranch Specific Plan Draft EIR (State Clearinghouse No. 216112012)
Placer County Board of Supervisors
Page 5 of 6

with landfill operation even with extensive odor mitigation and monitoring:
<http://www.wpwma.com/wp-content/uploads/2017/10/2017-Odor-Workshop-Presentation.pdf>.

Therefore, the SWLTF supports the EIR conclusion that “this impact would be significant and unavoidable”, but is deeply concerned about, and wonders how the County will ensure against, the potential ramifications to the landfill and MRF, as described in the Utilities chapter, should the County approve this Project. In other areas of the state, encroaching incompatible development has led to lawsuits and regulatory actions against solid waste facilities such as Newby Island in San Jose and Sunshine Canyon in Southern California. These actions have resulted in denials of expansion permits, significant financial ramifications, and abatement orders. The General Plan currently includes a one-mile residential land use buffer around the Landfill. Despite this buffer, the facility receives odor complaints. Reducing the buffer standards would increase the number of complaints. Even with mitigation, a certain extent of odors is inherent to solid waste operations, and therefore, adequate separation from incompatible uses is necessary to protect the long term viability of critical public facilities. The WPWMA facilities are valuable assets in Placer County and can support our community for years to come, if protected.

21-5
cont.

CEQA requires that “When the agency decides to approve a project that will cause one or more significant environmental effects, the lead agency shall prepare a statement of overriding considerations which reflects the ultimate balancing of competing public objectives.” The SWLTF urges the County to include in its overriding conditions how it will balance these competing land uses and protect these essential public facilities from potential closure or other impacts.

Chapter 4.15 Utilities

1. 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

This section states, “The close proximity of incompatible land uses and the resulting increased odor complaints that are likely to occur with project implementation could result in increased public pressure and enforcement action. 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.” While the EIR states that these are unlikely scenarios, and ultimately makes a Less than Significant finding, the SWLTF disagrees and feels that these potential impacts are real and significant.

21-6

As mentioned, in other areas of the state, encroaching incompatible development has led to lawsuits and regulatory actions against solid waste facilities such as Newby Island in San Jose and Sunshine Canyon in Southern California. These actions have resulted in denials of

Sunset Area Plan/Placer Ranch Specific Plan Draft EIR (State Clearinghouse No. 216112012)
Placer County Board of Supervisors
Page 6 of 6

expansion permits, significant financial ramifications, and abatement orders. In addition, finding alternative facilities would have a significant cost impact on citizens. If the County is forced to utilize alternative, out of county options for disposal and recycling, it will likely significantly increase ratepayer costs due to hauling waste longer distances and potentially needing additional trucks and routes if separate recycling service is required. In addition, complying with extensive new mandates could be difficult as there is a statewide shortage in organics processing facilities and the facilities and programs would be entirely outside local control. Additional complaints can result in violations being issued by Placer County Air Pollution Control District and other regulatory agencies which could limit or prohibit waste acceptance at the Landfill and/or MRF.

21-6
cont.

We appreciate this opportunity to comment on the Project Draft EIR. We trust that you will consider these comments as you give direction to County staff on the next steps in this important planning process.

Sincerely,



Devin Whittington
Chair, Solid Waste Local Task Force

cc: Crystal Jacobsen, Placer County Planning Services Division

Attachment: Prior Comment Letter dated February 15, 2018

3091 County Center Drive, Ste. 170 – Auburn, CA 95603 – DeWitt Center – (530) 889-6846 – Fax (530) 889-6809



PLACER COUNTY

SOLID WASTE LOCAL TASK FORCE

Devin Whittington, Chairman

May 3, 2018

Placer County Board of Supervisors
175 Fulweiler Avenue
Auburn, CA 95603

RE: SUNSET AREA PLAN AND PLACER RANCH SPECIFIC PLAN COMMENTS

The Solid Waste Local Task Force (SWLTF) is an advisory committee which, among other things, reviews and comments on proposed actions, programs, and facilities which affect the management of solid waste and diverted materials in Placer County. Membership of the SWLTF includes representatives from the cities of Roseville, Rocklin, Lincoln, Auburn, and Colfax, Town of Loomis, two franchise waste haulers, landfill and Material Recovery Facility (MRF) operators, the County Board of Supervisors, County Planning Commission, an environmental group, and the general public.

The SWLTF has concerns regarding the proposed Sunset Area Plan and Placer Ranch Specific Plan (SAP/PRSP), which we understand your Board will consider for approval sometime this year. These plans would modify the existing land use buffer zone standards that apply to solid waste facilities, potentially allowing residential and commercial uses as close as 2,000 or 1,000 feet, respectively (and potentially as close as 1,000 or 300 feet, respectively, when considered on a project specific basis), to the Western Regional Sanitary Landfill (Landfill) and MRF. We respectfully submit the following comments and concerns:

Reduced buffer standards could threaten the long-term viability of the Landfill and MRF. As stated in the General Plan, as well as the SAP/PRSP, the buffers are needed to separate potentially incompatible uses and protect the long term viability of critical public facilities. The SWLTF feels that bringing such land uses, particularly residential uses, in close proximity to the Landfill and MRF is incompatible and would not adequately separate those uses from odors and other impacts that could be perceived as nuisances. In other areas of the state, encroaching incompatible development has led to lawsuits and regulatory actions against solid waste facilities such as Newby Island in San Jose and Sunshine Canyon in Southern California. These actions have resulted in denials of expansion permits, significant financial ramifications, and abatement orders. The General Plan currently includes a one-mile residential land use buffer around the Landfill. Despite this buffer, the facility receives odor complaints. Reducing the buffer standards would increase the number of complaints. Even with mitigation, a certain extent of odors is inherent to solid waste operations, so adequate separation from incompatible uses is necessary to protect the long term viability of critical public facilities.

11476 C Avenue – Auburn, CA 95603 – DeWitt Center – (530) 889-6846 – Fax (530) 889-6809

Sunset Area Plan and Placer Ranch Specific Plan
Placer County Board of Supervisors
Page 2 of 2

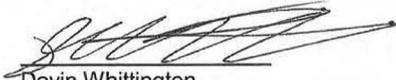
The Landfill and MRF are crucial public facilities. These facilities are owned and operated by the Western Placer Waste Management Authority (Authority), which is comprised of Placer County and the cities of Lincoln, Rocklin and Roseville. They provide the primary waste disposal and recycling services for the majority of Placer County. The MRF has been key in enabling Placer County jurisdictions to comply with state laws, such as AB 939 which mandates jurisdictions divert 50 percent of their waste from landfills or face fines of up to \$10,000 per day. Newer legislation such as SB 1383 which requires an additional 50 percent reduction in disposal of organic waste by 2020 and 75 percent reduction by 2025, and AB 1826 which requires most businesses to separate and recycle organic waste, will necessitate expansion of organic waste processing at the MRF. The Authority is currently in the conceptual planning phase for expansion of the landfill, MRF, and organics processing facilities. Each jurisdiction is required by the State to have fifteen years disposal capacity per AB 939. Having these crucial facilities in the County and under local control is invaluable as solid waste mandates continue to increase.

Finding alternative facilities would have a significant cost impact on citizens. If the County is forced to utilize alternative, out of county options for disposal and recycling, it will likely significantly increase ratepayer costs due to hauling waste longer distances and potentially needing additional trucks and routes if separate recycling service is required. In addition, complying with extensive new mandates could be difficult as there is a statewide shortage in organics processing facilities and the facilities and programs would be entirely outside local control.

Encroaching development could hinder future expansion of Landfill and MRF. Currently, the Authority is developing future expansion plans for the Landfill and MRF to meet future disposal and recycling needs of the County. The SWLTF asks that you consider this as you approve new specific and area plans in proximity to the landfill. Once incompatible development is in place, it will be considerably more difficult for WPWMA to gain the necessary approvals to expand. A potential solution would be to incorporate a coordination agreement into the SAP/PRSP between the County and WPWMA that creates a framework for land uses within and surrounding the WPWMA properties, including WPWMA's expansion plans, as well as mitigation measures to reduce impacts on surrounding development. The WPWMA facilities are valuable assets in Placer County and can support our community for years to come, if protected. Again, appropriate buffer standards and inter-agency coordination can ensure that protection.

We appreciate this opportunity to comment on the SAP/PRSP and ask that you take these comments into account as you consider both the merits and ramifications of this very important project.

Sincerely,



Devin Whittington
Chair, Solid Waste Local Task Force
Solid Waste Utility Manager, City of Roseville

Cc: Crystal Jacobsen, Placer County Planning Services Division

Letter 21	Placer County Solid Waste Local Task Force Devin Whittington, Chair February 13, 2019
----------------------------	---

- 21-1 The comment raises issues related to potential effects on the landfill as a crucial public facility, including expansion potential. The comment also raises concerns related to the cost of finding alternative facilities. See Master Response 4: Odors regarding impacts referenced in the comment, as well as the potential for the proposed project to affect future expansion of the WRSL. Also see response to comment 72-6 regarding the likelihood that waste would need to be hauled to an alternative solid waste disposal facility.
- 21-2 The comment states that using alternative options for disposal and recycling outside of Placer County would significantly increase ratepayer costs. The comment also suggests that complying with new mandates would be difficult. As discussed in Impact 4.15-6 of the Draft EIR, while buildout of the net SAP and PRSP areas would create new sources of solid waste to be disposed at facilities within Placer County, the MRF and WRSL have adequate capacity and the impact was determined to be less-than-significant. Additionally, CEQA requires evaluation of physical environmental effects and does not require the consideration of potential economic effects of a project. Regarding the new mandates, the comment does not identify mandates or a regulating agency. Also see response to comment 10-3.
- 21-3 The comment notes that the landfill buffer was the subject of previous litigation and that the Placer County General Plan was updated in August 2003 to include the 1-mile buffer. The comment suggests that the EIR explain the decision to support a reduction in the buffer. The proposed changes to General Plan Policy 4.G.11 are presented on page 3-74 of Chapter 3, "Project Description," of the Draft EIR. Impacts related to compatibility with the landfill are evaluated in Impact 4.10-2 of the Draft EIR. As noted in that discussion, the project would result in potentially significant impacts related to compatibility with the landfill, primarily due to odor concerns. While implementation of Mitigation Measure 4.10-2 would potentially aide in increasing land use compatibility, the impact would be significant and unavoidable as mitigation would not eliminate the source of the odor. See Master Response 4: Odors for additional information. Also, as part of its decision whether to certify the EIR and approve the project, Placer County would be required to provide a statement of overriding considerations explaining the reasons it may choose to approve the project despite its significant effects.
- 21-4 The comment's suggestion that the County should not reduce the landfill buffer is noted and will be considered by decision makers when they decide whether to approve the proposed project.
- 21-5 The comment provides suggested refinements to the mitigation measures identified in the Draft EIR and raises concerns about potential threats to the operation of the landfill resulting from land use conflicts. See Master Response 4: Odors regarding odor control measures included as part of Mitigation Measure 4.10-2. As part of its decision whether to certify the EIR and approve the project, Placer County would be required to provide a statement of overriding considerations explaining the reasons it may choose to approve the project despite its significant effects. For more discussion on this topic, see response to comment 36-3.
- 21-6 The comment expresses disagreement with the less-than-significant conclusion of Impact 4.15-11 of the Draft EIR in light of the statement in the analysis that acknowledges the increased odor complaints that are likely to occur. The comment also discusses the potential increase in ratepayer costs and limitations on waste acceptance at the MRF and WRSL. As stated on page 4.15-64 of the Draft EIR, evaluation of potential impacts related to diversion of solid waste to other facilities would be speculative. The analysis in Impact 4.15-11 references the discussion in Impact 4.10-2 related to land use compatibility. Finally, the analysis concludes that based on existing and future operations at the WRSL and research into other similar facilities around California, impacts would be less than significant. Also see Master Response 4: Odors and responses to comments 10-3 and 21-2.



Placer Group

P.O. Box 7167, Auburn, CA 95604

Letter
22

February 22, 2019

Leigh Chavez, Environmental Coordinator
Placer County Community Development Resources Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn CA 95603
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.

Comment period and time per person limited for the DEIR by the Planning Commission Chair¹

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.

22-1

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.

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.

22-1
cont.

22-2

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.

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. (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 relieving congestion. Six SR 65 lanes to

22-2
cont.

22-3

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.

22-3
cont.

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.

22-4

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.

22-5

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.

22-6

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.

22-6
cont.

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.

22-7

- 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,



Mike Garabedian
Placer Group Sierra Club
///x 916-719-7296

22-7
cont.

Letter 22	Placer Group Sierra Club Mike Garabedian February 20, 2019
----------------------	--

22-1 The comment expresses concern about the February 14, 2019 public hearing, specifically that it focused on the Draft EIR (and not the specific plan or development standards/design guidelines) and that it limited public comments to three minutes for individuals and five minutes for organizations.

CEQA guidance for public hearings is provided in Section 15202 of the State CEQA Guidelines, which states that formal hearings are not required at any stage of the environmental review process. Nonetheless, public hearings are often part of lead agencies' CEQA environmental review process because they facilitate the purpose and goals of CEQA related to public participation (State CEQA Guidelines Section 15201). Therefore, public hearings are encouraged but not required. With respect to the project, Placer County conducted a public hearing on February 14, 2019 during the public review period to receive comments on the Draft EIR. The hearing was held as part of the Placer County Planning Commission meeting, at 3091 County Center Drive, in Auburn. The meeting began at 10:00 a.m., with the project being the first agenda item at 10:05 a.m. and the public hearing on the Draft EIR concluded just after 1:00 p.m.

Per CEQA, a public agency may include, in its implementing procedures, procedures for the conducting of public hearings (State CEQA Guidelines Section 15202[f]). To that end, Placer County generally follows standard procedures for conducting public hearings for CEQA documents, including the following:

- ▲ Members of the public intending to provide public comments during the hearing are asked to sign up on the sign-in sheets provided and are called up to speak in the order they sign up;

- ▲ Comments are limited to three minutes for individuals and five minutes for representatives of a group or organization;
- ▲ Comments should be focused on the Draft EIR and not on the merits of the project, as that discussion occurs at subsequent hearings on the project;
- ▲ Comments are typically recorded to provide a record of the comments, and either a summary of the comments or a written transcript is included in the Final EIR; and
- ▲ County staff and/or consultants are available to answer questions from the Commission during the hearing; however, questions from the public are typically noted and a written response is provided later in the Final EIR.

Regardless of whether comments are provided orally or in writing, CEQA requires lead agencies to evaluate comments on environmental issues received from persons who reviewed the Draft EIR and to prepare written responses (State CEQA Guidelines Section 15088[a]). The written response shall describe the disposition of significant environmental issues raised; there must be a good faith, reasoned analysis in response (State CEQA Guidelines Section 15088[c]). This Final EIR contains written responses to significant environmental issues raised in comments on the Draft EIR (both those provided in writing and those provided at the February 14, 2019 public hearing).

- 22-2 The comment seeks a municipal services review for all other pending and proposed unincorporated new County-City and other developments. A municipal services review is not required for the SAP (including the PRSP). The PRSP area is not included within any sphere of influence by an adjacent jurisdiction. Only a small portion of the net SAP area is located within the City of Lincoln's sphere of influence and Lincoln has an adopted General Plan which outlines its projected growth patterns.
- 22-3 The comment expresses concern that fixed transit systems should be planned for the proposed project area. The Draft EIR and the project acknowledge that a planned BRT route would provide service through the PRSP area and western Placer County. The exact route for this BRT service is still to be determined and may be considered as part of the Long-Range Transit Master Plan effort referred to in Policy TM-3.1, or the SAP/PRSP transit master plan identified in Mitigation Measure 4.14-13a. This fixed route BRT service is expected to connect the PRSP and SAP areas to regional employment centers and transit hubs, including light-rail facilities in Sacramento County. Even with this BRT service, additional highway capacity would be necessary to serve forecasted traffic volumes, as described in the traffic analysis contained in the Draft EIR.

The comment also expresses opposition to major capacity enhancing highway projects, such as widening SR 65, the I-80/SR 65 interchange, and Placer Parkway. As described on page 4.14-94 of the Draft EIR, it remains reasonably foreseeable to include these projects in the cumulative traffic analysis because they are included in the financially constrained project list of the SACOG 2036 MTP/SCS. Therefore, it has no bearing on the Draft EIR traffic analysis inputs or findings.

- 22-4 The comment expresses concern about Williamson Act contracts. This issue is addressed in the Draft EIR in Section 4.2, "Agricultural Resources," under Impact 4.2-2 on page 4.2-15. As described therein, implementation of the project would not require cancellation of any Williamson Act contracts. The 716 acres currently under contract within the SAP area would not be impacted and would be maintained under the terms of each contract. The 716 acres includes properties located within land designated Preserve/Mitigation Reserve, which allows for agricultural uses and does not allow for development.
- 22-5 The comment states that the PCCP should move forward before the project is implemented. See Master Response 3: Placer County Conservation Program and Mitigation. The PCCP is expected to go before the County Board of Supervisors for decision at the end of 2019, or early 2020. However, as

described in the master response, the mitigation measures identified in the Draft EIR are not dependent on approval of the PCCP.

- 22-6 The comment indicates that there is a potential conflict of interest because the County used public funds for a County project. This comment does not raise issues related to environmental impacts or any issues regarding the adequacy of the Draft EIR. No further response is necessary.
- 22-7 The comment describes Sierra Club's vision for south Placer County, and requests a new public workshop be conducted to review the Citizen-Initiated Smart Growth Alternative. Going forward, several meetings will be held as part of the project approval process, and the public is invited to attend and provide comments at these meetings, which will include the Placer County Planning Commission and the Placer County Board of Supervisors.

Regarding the suggestion that the County begin workshops for the CISGP, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

Regarding the comment about the transportation funds, it is unclear what the comment is suggesting, but it does not appear to raise issues related to environmental impacts or issues related to the adequacy of the Draft EIR. Therefore, no further response is necessary.

From: Placer Women Democrats <pwdcommunication@gmail.com>
Sent: Wednesday, February 20, 2019 6:49 PM
To: Shirlee Herrington
Subject: Sunset Project

Letter 23

The Draft EIR for the Sunset Industrial Area Project and the Placer Ranch Specific Plan. revealed significant impacts to the environment that cannot be mitigated. Because of the Projects egregious environmental impacts, the Board of Supervisors should terminate the proposal by approving the "No Project" alternative.

If the Board determines to pursue the project, the Draft EIR must be recirculated because it fails to adequately analyze environmental impacts and is incomplete.

I respectfully request that as you recirculate the DEIR, that the Citizen Initiated Smart Growth Plan created by the Alliance for Environmental Leadership be analyzed as a Project alternative because the Citizen Initiated Smart Growth 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.

Melissa Harty-Swaleh

23-1

Letter 23	Placer Women Democrats Melissa Harty-Swaleh February 19, 2019
----------------------	---

23-1 The comment is primarily directed toward the project approval process and does not address the content, analysis, or conclusions in the Draft EIR. All comment letters submitted during the Draft EIR public review period will be reviewed and considered by the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

The comment requests that the Draft EIR be recirculated but does not provide specific reasons why the Draft EIR impact analysis is inadequate or incomplete. Therefore, a response is not warranted. Nonetheless, see Master Response 8: Recirculation for additional discussion on this topic.

The comment also suggests that the County evaluate the CISGP as an alternative. See Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.



Letter
24

February 19, 2019

Ms. Crystal Jacobson, Project Manager
 Placer County Community Development Resource Agency
 Environmental Coordination Services
 3091 County Center Drive
 Auburn, CA 95603

Subject: Comments Draft Environmental Impact Report (EIR) for the Sunset Area Plan/ Placer Ranch Specific Plan Project

Dear Ms. Jacobson:

Reclamation District No. 1000 (RD 1000; District) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan/Placer Ranch Specific Plan Project (Project). As noted in the District’s prior response to the Notice of Preparation (NOP) for this DEIR on February 27, 2018, RD 1000 is the entity responsible for the operation and maintenance of the levees and drainage system protecting the Natomas Basin in Sacramento and Sutter counties. Minimizing the impacts of flooding for human safety, health, and welfare is RD 1000’s sole mission. As such, the District has been working closely with the Sacramento Area Flood Control Agency (SAFCA), State Central Valley Flood Protection Board and U.S. Army Corps of Engineers (USACE) on levee improvements to provide a minimum of 200-year flood protection to the system commensurate with the flood risk, as required by State Urban Level of Flood Protection standards. Along with the levee improvements, RD 1000 has been working with SAFCA, Sutter County and Reclamation District 1001 to address impacts of upstream development in the Natomas Cross Canal watershed, which consequently includes the proposed Project.

Due to the nature of the Project and RD 1000’s mission to minimize impacts of flooding, the District requests the Final EIR specifically address the following comments:

DEIR Section 4.9 – Hydraulic Impact Analysis.

- The hydraulic impact analysis evaluates changes to peak stage for the 10 – 100 year flood events. The analysis does not include evaluation of the 200-year flood event, as required by the State’s Urban Level of Flood Protection (ULOP), because as stated in the report, the watershed is less than 10 square miles and therefore statutorily exempt. The District

24-1

RECLAMATION DISTRICT 1000
 1633 Garden Highway • Sacramento, CA 95833 • (916) 922-1449

Jacobson – Comments Draft Environmental Impact Report (EIR)
Sunset Area Plan/Placer Ranch Specific Plan Project
February 19, 2019
Page 2

acknowledges that while it may be accurate to say the Project is exempt from ULOP, the document does not adequately address impacts to the downstream levee systems, which are subject to the ULOP. The District requests the hydraulic impact analysis be revised to include evaluation of impacts for the 200-year flood event.

24-1
cont.

- The evaluation of hydraulic impacts focuses solely on mitigating increases in peak flood stage. However, downstream interests are also concerned with changes in the duration of flooding and changes in velocity that have the potential to increase erosion. This is particularly true for downstream levee systems that have a short hydrograph. Extending the duration of high water on these levee systems may result in increased performance issues associated with seepage both through and under the levees. The District requests that future EIR’s disclose the change in duration of flood events and determine whether that change adversely effects downstream levee systems. Mitigation measures could be considered that include alternatives such as groundwater recharge, metering the water more slowly out of the detention basin, or storage of the water for use.

24-2

- RD 1000 is concerned the potential impacts of increased storm water drainage flows into upstream tributaries for past projects; potential future projects; and specifically, for this Project, may increase flood risks downstream. Mitigating increased runoff is crucial in order to avoid downstream impacts to critical flood infrastructure. The detention/retention mitigation measures stated in the DEIR may not be considering all potential hydrologic impacts; specifically, increases to peak and base flows, the duration of runoff, duration of peak flows, and the subsequent increased periods of high velocities.

24-3

- Hydrographs for smaller systems tend to have shorter hydrographs. Past performance is based on this tendency and is considered in the design of downstream levee improvements. If detention is the alternative used to mitigate increases in peak flow, it can result in the adverse impact of extending the duration of the hydrograph. This has the potential to increase geotechnical problems, such as slope stability and under seepage, and can contribute to an increase of erosion potential, all of which would increase flood risk and create increased Operations and Maintenance (O&M) costs for downstream critical flood infrastructure. In addition, to peak flows and duration, upstream development typically results in higher base flows due to runoff from landscaping, wastewater treatment discharge, or other discharges associated with urbanization. Increasing base flows may also result in increased vegetation growth, erosion, and beaver activity; thus, causing an increase in downstream O&M costs.

24-4

Any of the impacts discussed in this letter could have detrimental downstream effects that not only could increase flood risk to public safety but could also result in increased O&M costs for RD 1000 that may be required in order to mitigate potential Project impacts. Flood risk may include erosion, increased vegetation, or potential impacts to channel maintenance or downstream flood infrastructure due to an increased duration of peak runoff and peak flows.

24-5

*Jacobson – Comments Draft Environmental Impact Report (EIR)
Sunset Area Plan/ Placer Ranch Specific Plan Project
February 19, 2019
Page 3*

Therefore, RD 1000 believes additional hydraulic analysis is critical to deciding the Project poses no significant hydraulic impacts, as part of its Environmental Impact Report (EIR). This Project should also consider any planned future development within the area that may contribute to cumulative downstream effects on both stage and duration of peak flows. Until these impacts are considered, any EIR submitted without proper analysis would not be complete and could not be certified.

24-5
cont.

The District appreciates the opportunity to review and comment on the DEIR for the proposed Project. The District is prepared to work with the County and the Project applicant along with the District’s flood control partners in the Natomas Cross Canal watershed. Should there be further questions or the need for additional clarification on the information provided, please contact me directly via email (kking@rd1000.org) or phone (916) 922-1449.

Sincerely,

Reclamation District 1000



Kevin L. King
General Manager

Cc: *Delivered via electronic mail only*

- Gary Bardini (SAFCA)
- Doug Libby (Sutter County)
- Guadalupe Rivera (Sutter County)
- Joe Henderson (RD 1001)
- Ric Reinhardt (MBK Engineers)

Letter 24	Reclamation District 1000 Kevin L. King, General Manager February 22, 2019
----------------------	--

24-1 The comment requests 200-year flood event modeling. The 200-year event is not a required event for evaluating hydraulic impacts for this project because of the State’s Urban Level of Flood Protection (ULOP) criteria, which statutorily exempts the project because the tributary watershed is less than 10 square miles. However, the PRSP Storm Drainage Master Plan in Appendix I of the Draft EIR does include a project level analysis of the 200-year event peak flows. (Note that a more recent version of the PRSP Storm Drainage Master Plan that includes minor revisions is provided as Appendix E of this Final EIR.) This analysis shows that post-project 200-year peak flows would be reduced to below 80 percent of pre-project peak flows at Compliance Points 1 and 3. Projects within Placer County are required to mitigate for the effects of development. Storage facilities that provide mitigation are designed for storm events up to and including the 100-year storm as required per Section VII.C.2 of the Placer County Stormwater Management Manual. Development within the net

SAP area is analyzed at a programmatic level for this EIR. The SAP Storm Drainage Technical Report (Appendix C of the Draft EIR) states that detailed level analyses and mitigation measures would be provided at future development stages. The 200-year event would be analyzed for applicability under ULOP and detailed as needed for individual projects proposed within the SAP. The volumetric retention studies in Draft EIR Appendix D evaluate the proposed volumetric mitigation alternatives including that for the Pleasant Grove Retention Facility. These facilities (if selected and implemented) would provide volumetric mitigation of stormwater during large storm events. The preliminary design analysis for these facilities have utilized an 8-day, 100-year design storm event to calculate needed mitigation volumes. This storm event is based on the precipitation produced by the February 1986 historical flood. The final project level analysis for the Pleasant Grove Retention Facility, assuming that is the chosen mitigation alternative, is expected to analyze a variety of storm event intervals including the 200-year event within the project area. However, it should be noted that the 100-year, 8-day design event as analyzed utilizes a storm depth of 10.75-inches at an elevation of 200-feet. This large storm event would include several shorter duration 200-year events. For comparison, the 200-year, 1-day storm depth at an elevation of 200-feet is 4.82-inches and the 200-year, 5-day storm depth is 9.86-inches. Therefore, downstream impacts for the 200-year event are expected to be consistent with the conclusion identified in Draft EIR Impact 4.9-1, considering that mitigation and preliminary retention facility design uses this historical design flood event. No revisions to the Draft EIR are necessary.

- 24-2 The comment requests future EIRs disclose the change in duration of flood events and determine whether that change adversely affects downstream levee systems. Changes to the duration of flooding for the 100-year, 8-day design storm event would be mitigated by the Regional Volumetric Facility (i.e., Pleasant Grove Retention Facility), which would be able to hold the increases in runoff volumes, such that increases in "Volume-Duration" issues should not occur for that event. The detention basin designs for peak flow mitigation would also accomplish mitigation of some volume-duration issues as discussed in those projects' specific drainage analysis, as required by Mitigation Measures 4.9-1a and 4.9-1b. The analysis and conclusion identified in Impact 4.9-1 are adequate; no revisions to the Draft EIR are necessary.
- 24-3 The comment expresses concern regarding base flows. The County has developed standards for meeting the requirements of the Phase II MS4 permit, contained within the West Placer Storm Water Quality Design Manual. An element of this permit is to design LID and water quality facilities to capture increased runoff for storm events up to the 85th percentile storm event. This would minimize base-flow impact concerns from the development areas. No revisions to the Draft EIR are necessary.
- 24-4 The comment repeats similar comments as noted above. See responses to comments 24-2, 24-3, and 24-5.
- 24-5 The comment summarizes similar volume-discharge concerns as identified in comments 24-2, 24-3, and 24-4. The projects that develop in the PRSP and SAP areas would be required to provide the mitigation measures described in comments 24-2 and 24-3 above. These projects would be required to mitigate peak flow and volumetric impacts per the Placer County Stormwater Management Manual design standards. The volumetric mitigation methodologies currently outlined in the PRSP and SAP are based on the 100-year, 8-day design storm event criteria developed for use in the Natomas Cross Canal Watershed by the City of Roseville, City of Lincoln, and Placer County. The proposed measures would minimize the potential for increases in peak flow and volume of runoff. The analysis and conclusion identified in Impact 4.9-1 are adequate; no revisions to the Draft EIR are necessary.