

From: Susan Calhoun <scalhoun@rcsdk8.org>
Sent: Wednesday, January 23, 2019 10:15 AM
To: Placer County Environmental Coordination Services
Cc: Dennis Snelling; Justin Barrett
Subject: Re: Sunset Area Plan/Placer Ranch Specific Plan (State Clearinghouse No. 2016112012)

Letter 25

Good Morning Shirlee!

Thank you so much for adding me to your distribution list!

I have been updated from our Assistant Superintendent of Business Services, Dennis Snelling, regarding my initial response. We will need to enter into full mitigation agreements at about \$27,000 per home in today's dollars in order to build schools for the future students. Please disregard my previous email.

25-1

Thank you and have a great day!

Susan Calhoun
Maintenance and Facilities
Roseville City School District
 (916) 782-5289 x 50203

On Wed, Jan 23, 2019 at 9:57 AM Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov> wrote:

Thank you for your interest in the subject project and for taking the time to provide comments. This is to confirm that your comments have been received. Also, you are on our master email and/or USPS distribution list for the subject project and, as such, you will receive updates and notifications of future opportunities to for participation and input.

Thanks.

.....
 Shirlee Herrington
 Community Development Technician Environmental
 Coordination Services
 Placer County Community Development Resource
 Agency 3091 County Center Drive, Suite 190, Auburn,
 CA 95603 530-745-3132 fax 530-745-3080

From: Susan Calhoun [mailto:scalhoun@rcsdk8.org]
Sent: Tuesday, January 22, 2019 12:47 PM
To: Placer County Environmental Coordination Services
Cc: Justin Barrett; Dennis Snelling
Subject: Sunset Area Plan/Placer Ranch Specific Plan (State Clearinghouse No. 2016112012)

Thank you for the opportunity to respond to the proposed project referenced above. Additional funding is necessary to adequately accommodate the future K-8 grade students in the Roseville City School District.

25-2

Collection of developer fees pursuant to Government Code Section 53080 and 065995 on the above referenced project, located on 8,497 acres in South Placer County, will be as follows, subject to change based upon fees in effect at the time of payment:

- Residential: \$2.29 per square foot
- Commercial: \$0.37 per square foot
- Active Adult: \$0.03 per square foot

Please contact me if you have any further questions.

Have a great day!

Susan Calhoun
Maintenance and Facilities
Roseville City School District
 (916) 782-5289 x 50203

Letter 25	Roseville City School District Susan Calhoun, Maintenance and Facilities January 23, 2019
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- 25-1 The comment from the Roseville City School District (RCSD) states that the District would need to enter into full mitigation agreements at approximately \$27,000 per residential unit to build schools for future students. As discussed in Impact 4.13-3 of the Draft EIR, payment of school fees would be considered full mitigation for impacts on school capacity. The comment provides an approximate amount of fees per residential unit that would be needed. Agreements between RCSD and project developers regarding building fees are beyond the scope of the EIR as CEQA requires an EIR to focus on potential impacts of a project on the physical environment. As discussed in Impact 4.13-3, physical effects on the environment associated with the construction and operation of new school facilities in the project area are evaluated in the resource sections of the Draft EIR.
- 25-2 The comment cites to sections of the Government Code regarding developer fees and notes that projected fees would be subject to change based on fees in effect at the time of payment. See response to comment 25-1.

From: Landon, Joseph <jlandon@rjuhsd.us>
Sent: Friday, February 22, 2019 10:54 AM
To: Placer County Environmental Coordination Services
Subject: Comments for Sunset Area Plan & Placer Ranch Specific Plan

Letter
26

Hi,

I have the comment below to submit in regards to the Sunset Area Plan & Placer Ranch Specific Plan:

The proposed project will generate a large number of students severely impacting the Roseville Joint Union High School District’s ability to house these additional pupils. Current State and local funding avenues available to the District are woefully inadequate to cover the costs of housing these additional students creating a serious hardship on the District. To address this, the District desires to enter into a Mutual Benefit Agreement with the developer to ensure adequate funding is available to pay for school facility needs created by this project. The district supports the plan if the developer and the district are able to come up with an agreement to the satisfaction of both parties.

26-1

Thank you,

Joe Landon, CPA

Assistant Superintendent, Business Services
 Roseville Joint Union High School District
jlandon@rjuhsd.us
 (916)782-6565 ext.1021

From: Crystal Jacobsen <CJacobse@placer.ca.gov>
Sent: Tuesday, February 19, 2019 7:46 AM
To: Landon, Joseph <jlandon@rjuhsd.us>
Cc: Davis, Scott <scdavis@rjuhsd.us>; 'Mike Tucker' <tucker@girardedwards.com>; Shirlee Herrington <SHerrington@placer.ca.gov>
Subject: RE: Comments for Sunset Area Plan & Placer Ranch Specific Plan

Hi Joseph,

Written comments can be submitted in the form of an email or a letter and should be submitted no later than 5pm on Friday, February 22, 2019. Here’s the specifics about where to send comments:

Placer County Community Development Resource Agency
 Environmental Coordination Services
 3091 County Center Drive, Suite 190
 Auburn, CA 95603
 Or fax (530)745-3080
 Or email cdraecs@placer.ca.gov

Let me know if you have any further questions.

Best,
Crystal

Crystal Jacobsen | Principal Planner, Advanced Planning
 Placer County Community Development Resource Agency
 Planning Services Division
 3091 County Center Drive Ste. 140, Auburn, CA 95603
 530.745.3000 (main) | 530.745.3085 (direct) | 530.745.3080 (fax) | cjacobse@placer.ca.gov



Letter 26	Roseville Joint Union High School District Joe Landon, CPA, Assistant Superintendent February 22, 2019
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- 26-1 The comment states that current state and local funding avenues available to the Roseville Joint Union High School District (RJUHSD) are inadequate to cover the costs of additional students and that the RJUHSD would like to enter into a mutual benefit agreement with the project developer to ensure adequate funding. See response to comment 25-1.

**Letter
27**

Re: Exhibits 4.91 and 4.9.2

First of all, Auburn is NOT and intermittent stream, not an ephemeral stream. It is a year-round stream with its our year-round natural flow as CDFW and NOAA both determined. In an attached letter date March 10, 2015, garnered by SARSAS through Freedom of Information Act, one of the three violations listed by California Department of Fish Wildlife’s (CDFW) Regional Manager Tina Bartlett against Nevada Irrigation District is F and G Code Section 1602 – “diverts the natural stream flow of Auburn Ravine Creek into Hemphill Canal”. Auburn Ravine obviously has a natural flow and is NOT “an intermittent stream”.

27-1

Too, Water Agencies have somehow started using Auburn Ravine, a natural waterway, for water deliveries to its customers which seems a violation of a natural waterway; is there authorization for agencies to so use these ravines?

27-2

Secondly, our concern is that SAP will create such runoff by the paving over of natural lands that the runoff which flows into Orchard Creek will definitely be polluted and Orchard Creek is a main tributary of Auburn Ravine.

27-3

Thirdly, both streams of Auburn Ravine Watershed, Racoon and Auburn Ravine, after the effluent from Orchard Creek enters Auburn Ravine, are joined at the Eastside Canal, which flows into the Eastside Canal, and then water are then mixed with those of Pleasant Valley Creek. All of these waters then flow into the Sacramento River at the fishing hamlet of Verona. Any contamination that enters any of these three creeks also negatively impacts the Sacramento River.

27-4

Pleasant Valley Creek is also erroneously listed as an intermittent creek. We just installed dual cone screens at the junction of Auburn Ravine and Pleasant Grove Canal, which diverts water from Auburn Ravine into Pleasant Grove Creek. Since Auburn Ravine is a year-round stream and its water flow into Pleasant Grove Creek, it follows the Pleasant Grove Creek in not an intermittent stream either.

27-5

These kinds of inaccuracy must be corrected and the reality addressed before any continuance of the SAP takes place.

Every effort possible should be taken to prevent this SAP contamination into our local creeks and the Sacramento River from taking place.

Jack L. Sanchez
SARSAS President and Founder



State of California – The Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670-4599
916-358-2900
www.wildlife.ca.gov

EDMUND G. BROWN, Jr. Governor
Charlton H. Bonham, Director



BY OVERNIGHT MAIL AND EMAIL

MAR 10 2015
Date

#2 Remleh Scherzinger, General Manager
Nevada Irrigation District
1036 West Main Street
Grass Valley, CA 95945
scherzinger@nidwater.com

#1 RON NELSON
FROM
TINA BARTLETT

Subject: Suspension of Notification of Lake or Streambed Alteration (Notification No. 1600-2014-0270-R2).

Dear Mr. Scherzinger:

On November 3, 2014, the Department of Fish and Wildlife received the Nevada Irrigation District's (NID) above-referenced notification (notification) to conduct maintenance activities on NID's existing Hemphill Dam (dam). As Department staff informed you on March 2, 2015, the Department is suspending processing of the notification pursuant to Fish and Game Code section 1613 for the reasons discussed during a site visit with you on February 10, 2015, and below.

Under Fish and Game Code section 1613, the Department may suspend processing a notification if it determines "the activity described in the notification, or any activity or conduct by the entity directly related thereto, violates any provision of the [Fish and Game Code]." Section 1613 applies in this case for two reasons: 1) the dam violates Fish and Game Code section 5901 because it "prevents, impedes, or tends to prevent or impede the passing of fish up and downstream"; 2) the dam substantially diverts the natural flow of Auburn Ravine Creek into Hemphill Canal, but NID has yet to notify the Department under Fish and Game Code section 1602 for this diversion. The Department understands the primary objective of the project described in the notification is to enhance the passage of anadromous fish at the dam. However, even with the project, the dam will still impede or tend to impede the passing of fish up and downstream.

(5937) trust?

NID will need to address the problems described above before the Department will continue processing the notification. In the meantime, NID may not proceed with the project described in the notification.

If you have any questions regarding this matter, or would like to meet with the Department in an effort to resolve the issues described herein, please contact Patrick

Conserving California's Wildlife Since 1870

EDMUND G. BROWN, Jr. Governor 

Nevada Irrigation District
1600-2014-0270-R2
Page 2 of 2

Moeszinger, Environmental Scientist, at (916) 358-2850 or by email at patrick.moeszinger@wildlife.ca.gov. Thank you for your anticipated cooperation.

Sincerely,



Tina Bartlett
Regional Manager

cc: Patrick Moeszinger
patrick.moeszinger@wildlife.ca.gov

Jennifer Nguyen
jennifer.nguyen@wildlife.ca.gov

Wildlife Officer, Erica Manes
erica.manes@wildlife.ca.gov

Lauren Mulloy
lauren.mulloy@wildlife.ca.gov

MaryLisa Lynch
marylisa.lynch@wildlife.ca.gov

Lieutenant, John Lawson
john.lawson@wildlife.ca.gov

Captain, Mark Jeter
mark.jeter@wildlife.ca.gov

Mike Healey
mike.healy@wildlife.ca.gov

Colin Purdy
colin.purdy@wildlife.ca.gov

Letter	SARSAS [Save Auburn Ravine Salmon and Steelhead]
27	Jack L. Sanchez, President and Founder
	No date

- 27-1 The comment states that Auburn Ravine is a perennial stream. In the Environmental Setting of Section 4.9, "Hydrology and Water Quality," on page 4.9-1, the Draft EIR explains that while Auburn Ravine functions as an intermittent stream under natural conditions, its hydrology has been altered by year-round discharges from wastewater treatment, power generation, and irrigation. These discharges now maintain year-round flow in the ravine.
- 27-2 The comment asks about oversight for discharges to natural waterways. Discharges to waters of the United States (including intermittent streams and some wetlands) are regulated through the Clean Water Act. Additionally, California regulates discharges to waters of the state through the Porter-Cologne Water Quality Control Act. See Section 4.9.3, "Regulatory Setting," of the Draft EIR for additional discussion of this topic. Further, it is important to note that the County does not have regulatory authority over water purveyors.
- 27-3 The comment expresses concern regarding the water quality effects of development associated with the SAP. The Draft EIR addresses potential water quality effects in Impact 4.9-3: Construction related water quality impacts, and Impact 4.9-4: Water quality impacts from urban land uses.
- 27-4 The comment expresses similar concerns to comment 27-3 related to water quality. See response to comment 27-3, above.
- 27-5 The comment states that Pleasant Grove Creek is a perennial stream. As discussed in Section 4.9.2 of the Draft EIR, Pleasant Grove Creek and its tributary channels were historically intermittent streams that dried in summer; however, many of the channels now have perennial flows from urban runoff, agricultural irrigation return flows, and contributions from the Pleasant Grove Wastewater Treatment Plant.



<p>Letter 28</p>

Sierra Nevada Group
Mother Lode Chapter

P.O. Box 1042 Nevada City, California 95959

February 20, 2019

Shirlee Herrington
 Environmental Coordination Services
 3091 County Center Drive, Suite 190
 Auburn, CA 96503
cdraecs@placer.ca.gov

Re: Sunset Area Plan/Placer Ranch Specific Plan Draft Environmental Impact Report

Dear Ms. Herrington:

I write on behalf of the Sierra Nevada Group of the Sierra Club. Though we reside in Nevada County we are concerned about many aspects of the Sunset Area Plan and Placer Ranch Specific Plan DEIR. We do absorb the GHGs, the ozone, the ever-increasing traffic in the region, the loss of open space, vernal pools, wetlands – all significant impacts associated with this very large project.

A primary concern regarding the SAP/PRSP DEIR is its disturbing lack of strategic planning for the future in the face of our rapidly changing climate and its indisputable cause – Green House Gas emissions. The Plan continues with a business-as-usual model of automobile dependency throughout the area with a projected 870,000 daily vehicular trips spewing 575,000 metric tons per year of Green House Gases and virtually no viable public transit. Does the County really expect that this type of planning can be accepted? Granted that an earlier plan (1997) was being used and reworked, but surely someone must have called your attention to its shortcomings even then. We can't keep repeating the mistakes of the past – we must design for the future.

What happened to Smart Growth? Our world is changing in many unexpected ways and Placer County leaders must recognize that continuing to use the model of low density, automobile-dependent housing with the hope that it will match the jobs portion of the SAP is not what is needed to combat the threat we are facing. In fact the industrial/commercial jobs portion of the Plan is in excess of the housing portion creating an imbalance and the specter of more vehicular trips – more GHGs.

28-1

Sierra Nevada Group of the Sierra Club comment letter

A serious flaw is the lack of public transit or futuristic thinking about it. Much of the circulation is dependent on a parkway that isn't built yet and may be subject to delays and changes. Perhaps if there were a re-design, reorganizing the placement of housing, schools and jobs, some innovation could be brought forward, such as rail (there is a nearby track in place) or transit hubs that could accommodate bus transit.

28-2

The need for mitigation for so many significant and unavoidable impacts in the current Plan could make it unaffordable for the County and its backers to move forward. Couldn't some of that mitigation money be better used to provide low-income housing and the types of transit that would reduce the climate-changing Green House Gas emissions? And help finance building improvements to make all the new buildings (housing, commercial and industrial) zero net energy – which will be a California requirement in 2020.

28-3

Regardless of how it is paid for, the goal of the Project overall should be to reduce energy needs for homes and businesses and that developers and builders are required to meet those standards and overall goals. Reducing the Project's footprint would go a long way toward lowering its mitigation costs and impacts to the region.

As discussed above, the PRSP/SAP DEIR revealed significant impacts to the environment that cannot be sufficiently mitigated. Because of the Project's numerous and dangerous environmental impacts, the Board of Supervisors should terminate the proposal by approving the "No Project" alternative. Failing that, then the Draft should be recirculated to more completely analyze the impacts. In the recirculation, we ask that an Alternative entitled Citizen-Initiated Smart Growth Plan developed by Alliance for Environmental Leadership (AEL) also be analyzed as an environmentally superior Alternative which actually meets the County's objectives specified in the DEIR.

28-4

I believe we as citizens of today have an obligation to citizens of tomorrow to not continue to destroy the world in which they will have to live and work.

Thank you for the opportunity to provide comments.

Sincerely,



Barbara Rivenes, Chair
Sierra Nevada Group/Sierra Club
108 Bridger Ct.
Grass Valley, CA 95945

Letter 28 | Sierra Club, Sierra Nevada Group
Barbara Rivenes, Chair
February 20, 2019

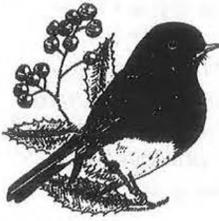
28-1 The comment expresses concern about the project's significant impacts related to GHGs, ozone, traffic, open space, vernal pools, and wetlands. These issues are addressed in their respective sections of the Draft EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIR are raised in this comment. Therefore, no further response is warranted.

- 28-2 The comment expresses concern regarding the lack of planned public transit service. The Draft EIR and the SAP and PRSP 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 and/or the SAP/PRSP transit master plan identified in Mitigation Measure 4.14-13a of the Draft EIR. 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.
- 28-3 The comment states that the need for mitigation could make it unaffordable to move forward with the project. Financial issues such as these are not a physical environmental effect under CEQA and are not required to be analyzed in an EIR or other CEQA analysis. The Placer County Planning Commission and Board of Supervisors will weigh the environmental impacts and benefits of the project when making decisions regarding the project.
- 28-4 The comment states that the goal of the project should be to reduce energy needs for homes and businesses and that developers and builders should be required to meet those standards and overall goals. Section 3.4, "Goals and Objectives," of the Draft EIR lists the objectives for both the SAP and PRSP. Specifically, the PRSP contains goals to foster sustainable community design and enable Blueprint consistency (see Draft EIR page 3-8), which both speak to energy efficiency. Energy efficiency is also addressed in the Draft EIR in Section 4.16, "Energy." The County's General Plan, with which the project must comply, includes energy efficiency goals that are listed in the Draft EIR on page 4.16-7. Likewise, the SAP includes goals and policies related to energy consumption, which are listed on pages 4.16-9 through 4.16-14 of the Draft EIR.

The comment also states that because of the project's significant and unavoidable impacts, the County should approve the No-Project Alternative. This comment is 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.



SIERRA FOOTHILLS AUDUBON SOCIETY
P.O. BOX 1937
GRASS VALLEY CA 95945-1937

Letter
29

February 10, 2019

Shirlee Herrington
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603
cdraecs@placer.ca.gov

RECEIVED
FEB 15 2019
CDRA

Re: Sunset Area Plan/Placer Ranch Specific Plan Draft Environmental
Impact Report (State Clearinghouse No. 2016112012)

Dear Ms. Herrington:

On behalf of the Sierra Foothills Audubon Society (SFAS), I am submitting our comments on the Sunset Industrial Area and Placer Ranch in Placer County DEIR. SFAS is an organization whose main geographical area of work is Placer and Nevada counties. We have the following concerns that we respectfully request be addressed by the County.

The DEIR Section 2.7 "Summary of Environmental Impacts and Recommended Mitigation Measures" lists mitigation measures (fixes) for all impacts. This letter concerns the impacts and mitigations relating to greenhouse gas emissions.

Impact 4.7-2: Operational greenhouse gas emissions

"Operation of the land uses developed under the net SAP area is estimated to generate 378,518 MTCO₂e/year at full buildout, and operation of the land uses developed under the PRSP area is estimated to generate 201,004 MTCO₂e/year at full buildout. These levels of GHG emissions have the potential to result in a considerable contribution to cumulative emissions related to global climate change and conflict with state GHG reduction targets. **This impact would be significant.**"

Various mitigations are proposed as noted below, but 4.7.2 still is considered **significant and unavoidable**.

Mitigation Measure 4.7-2a: Implement all feasible on-site features to reduce operational GHG emissions (Net SAP Area and PRSP Area)

Building Energy

Reduce GHG emissions associated with building energy through the following measures:

Sierra Foothills Audubon Society's mission is to work within our community to promote appreciation of and protection for birds and their habitats.

- *Single family residential buildings constructed within the net SAP area and the PRSP area shall be designed to achieve a 30 percent reduction in energy use versus a standard 2016 Title 24 code-compliant building. Reductions in energy shall be achieved by following the energy efficiency performance standards set forth in Tier 2 of the 2016 California Green Building Standards Code, Section A4.203.1.2.2. These reductions shall be achieved by employing energy efficient design features and/or solar photovoltaics. Compliance shall be demonstrated using CEC-approved residential energy modeling software.*
- *Multi-family residential buildings of three stories or less constructed within the net SAP area and the PRSP area shall be designed to achieve a 15 percent reduction in energy use compared to a standard 2016 Title 24 code-compliant building. Reductions in energy shall be achieved by following the energy efficiency performance standards set forth in Tier 1 of the 2016 California Green Building Standards Code, Action A4.203.1.2.1. These reductions shall be achieved by employing energy efficient design features and/or solar photovoltaics. Compliance shall be demonstrated using CEC-approved residential modeling software.*
- *Commercial buildings (including multi-family residential structures four stories or higher) shall be designed to achieve a 10 percent or greater reduction in energy use compared to a standard 2016 Title 24 code-compliant building. Reductions in energy shall be achieved through energy efficiency measures consistent with Tier 1 of the 2016 California Green Building Standards Code, Section A5.203.1.2.1. Alternatively, this could be met by installing on-site renewable energy systems that achieve equivalent reductions in building energy use.*
- *All project buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of the 2016 California Green Building Energy Code, Sections A4.106.5 and A5.106.11.2.*

The DEIR states: *“Under Appendix G of the State CEQA Guidelines, a project would result in a cumulatively considerable contribution to climate change if it would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Placer County is the CEQA lead agency for the project and is, therefore, responsible for determining whether an impact would be considered significant. At the time of writing this Draft EIR, Placer County does not have an adopted Climate Action Plan consistent with State CEQA Guidelines Section 15185.5(b)”.*

The DEIR also states: *“The Placer County General Plan includes the following policies related to addressing GHG emissions and climate change in Placer County:*

Policy G-1: The County shall require that all new dwelling units meet current State requirements for energy efficiency, and encourage developers to exceed Title 24 requirements. Retrofitting of existing units shall be encouraged.

Policy G-3: The County shall continue to implement provisions of the Subdivision Map Act that require subdivisions to be oriented for solar access, to the extent practical.”

Our comments

California’s 2019 Building Energy Efficiency Standards officially take effect on January 1, 2020. Single-family homes built with the 2019 standards will use about 7 percent less energy due to energy efficiency measures versus those built under the 2016 standards. Once rooftop solar

Sierra Foothills Audubon Society's mission is to work within our community to promote appreciation of and protection for birds and their habitats.

29-1

electricity generation is factored in, homes built under the 2019 standards will use about 53 percent less energy than those under the 2016 standards. This will reduce greenhouse gas emissions by 700,000 metric tons over three years, equivalent to taking 115,000 fossil fuel cars off the road.

We ask that even if building permits are granted this year, given the climate emergency and the California renewable goals, that these projects be required to meet the 2020 Title 24 Chapter 6 Building Rules of zero net energy for all single residence homes in the project area. We also suggest that non-residential buildings be required meet the 2030 standard of zero net energy, without height limitations. Cool roof should be required in connection with solar panels.

29-1
cont.

Implementing these suggestions will help reduce the operational GHG emissions (Net SAP Area and PRSP Area) and change the determination from unavoidable to avoidable. The revised County EIR must show the projected greenhouse gas emissions after the required changes are made.

Other policies referred to in the DEIR

The Proposed Sunset Area Plan goals include:

- a) *Policy NR-6.2: Energy Efficient Construction. The County shall encourage new construction to achieve third-party green building certification, such as the GreenPoint Rated program and the LEED rating system. This will include building and capital improvement design practices that reduce energy consumption, maximize energy conservation, promote passive solar energy generation or other on-site electricity generation, and incorporate natural ventilation.*
- b) *Policy NR-6.7: Residential Energy Efficiency. The County shall encourage residential units to be designed to maximize energy efficiency.*

Our comments

We appreciate the use of “shall” rather than “should” but how does one measure the outcome of **encouragement** with respect to energy efficiency, or for that matter, the success of **promoting** passive solar energy generation.

29-2

We ask that the policies change the word “encourage” to “require”. “Encourage” does not reflect the urgency to deal with the existential threat of climate change. We also ask that the County include the actual LEED rating system set standards that will indicate whether the Developer has made sufficient effort to actually implement the standards that are actually in use in the building industry. Again, The County EIR must show the projected greenhouse gas emissions after the required changes are made.

Mitigation Measure 4.7-2b: Purchase carbon offsets (Net SAP Area and PRSP Area)

“The County will require project proponents of individual developments under the project to offset operational GHG emissions remaining after implementation of Mitigation Measure 4.7-2a. The net SAP area would generate 373,896 MTCO2e/year after implementation of Mitigation Measure 4.7-2a. PRSP would generate 195,014 MTCO2e/year after implementation of Mitigation Measure 4.7- 2a. The total GHG emission offset requirement would be 193,914 MTCO2e, or 27.14 MTCO2e/year for each residential unit in the PRSP area.”

Sierra Foothills Audubon Society's mission is to work within our community to promote appreciation of and protection for birds and their habitats.

If the buildings including residential and non-residential all comply with zero net energy as required by Title 24 in 2020, then there will be no need for this mitigation. 29-3

The DEIR refers to the mpower program. *MPOWER is a local program in Placer County that provides financing to property owners for the installation of energy and water efficiency retrofits and renewable energy systems. Investing in mPOWER is consistent with the County's General Plan Policy 2.G.5, as described above in Section 4.7.3, "Regulatory Setting." Other examples of local direct investments include financing installation of regional electric vehicle-charging stations, paying for electrification of public school buses, and investing in local urban forests.*

There is no reason that the Developer shouldn't be required to make these investments on behalf of property owners as the project is being built. Otherwise, there is no guarantee that the property owner will go forward with the investments. 29-4

If zero net energy is implemented, we see no reason why mitigations as called for under 4.7.2b will be required. Electric vehicle-charging stations and bus-electrification must be required as part of the development to offset the vehicle trips from residents of the development.

Other suggestions

- Paths - consider using compacted crushed rock for trails. It's cheaper, faster, permeable, and produces less CO2 emissions than concrete.
 - Ban grass lawns for water conservation leading to less energy use.
 - No natural gas lighting. LED only with nighttime glare minimized.
 - Electric car chargers for apartment use.
 - "smart glass" – electrochromatic windows
 - Drought resistant trees that do not block solar.
 - Solar pv in all parking lots.
- 29-5

In addition to our comments, the Alliance for Environmental Leadership will submit an Alternative 6 to the DEIR. This Alternative meets all of the County's Objectives and will be environmentally superior to the proposed Project and the other Alternatives included in the DEIR. We believe that under CEQA that the Citizen Initiated Smart Growth Plan (CISGP), produced by the Alliance for Environmental Leadership, must be fully analyzed as an Alternative. 29-6

Thank you for the opportunity to provide comments on the DEIR. We look forward to a thorough response from the County.

Sincerely,
Don Rivenes
Don Rivenes, Conservation Chair
Sierra Foothills Audubon Society
PO Box 1937
Grass Valley CA 95945
530-477-7502

Sierra Foothills Audubon Society's mission is to work within our community to promote appreciation of and protection for birds and their habitats.

Letter 29	Sierra Foothills Audubon Society Don Rivenes, Conservation Chair February 10, 2019
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29-1 The comment requests that all residential development built under the project comply with the 2019 California Energy Code (CCR Title 24 Part 6) even if building permits are granted in 2019. Based on the current project schedule, there would not be building permits granted in 2019 and thus the first residential buildings constructed after EIR certification would be required to comply with the 2019 California Energy Code at a minimum. The comment incorrectly states that the 2019 California Energy Code results in zero net energy residential buildings. While the 2019 standards would require on-site solar photovoltaics, new residential buildings would be required to offset their electricity demand with the solar system, not their natural gas demand. The 2019 standards are also anticipated to reduce energy consumption by 7 percent (CEC 2018). While new residential buildings constructed to 2019 California Energy Code compliance may not be zero net energy, the remaining amount of project-wide emissions that exceeds 1,100 metric tons of carbon dioxide equivalent per year would be offset by carbon credits, as discussed in Mitigation Measure 4.7-2b of the Draft EIR. Through these efficiency achievements, on-site renewable systems, and offset of natural gas consumption, residential buildings would effectively become zero net energy.

The comment also requests that all nonresidential development be built to the 2030 California Energy Code and be zero net energy. At the time of writing the EIR, future iterations of the California Energy Code and their contents are not known beyond 2019. It would be speculative to assume that all new nonresidential buildings built to the 2030 standards would be zero net energy as the California Energy Commission has not yet determined if this is technologically and financially feasible. The 2019 California Energy Code would reduce energy consumption from residential buildings above three stories and nonresidential buildings by 53 percent, which is a greater reduction than the 2016 California Green Building Standards Codes that is included in Mitigation Measure 4.7-2a of the Draft EIR.

The comment adds that cool roofs should be required in connection with solar panels. A discussion on page 4.7-21 of the Draft EIR states, "All project buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of the 2016 California Green Building Energy Code, Sections A4.106.5 and A5.106.11.2." Although project buildings would be built to later iterations of the building codes, this requirement would carry forward.

It is important to note that at the time of writing the Draft EIR, the 2019 California Energy Code standards and associated energy savings were not yet available and thus the language in Mitigation Measure 4.7-2a reflects anticipated achievements in the new iteration of the California Energy Code.

29-2 The comment questions the project's energy policies and asks how to measure outcomes of policies that encourage promotion of passive solar energy generation. CALGreen 2019 Building Code requires solar installation, or the equivalent energy reduction potential from energy-efficient design features, in all residential development by 2020. By 2030, non-residential development would be required to install solar or achieve the equivalent energy reduction potential. As stated in Mitigation Measure 4.7-2a, compliance with energy efficiency performance standards requires the applicant to demonstrate compliance using CEC-approved residential energy modeling software, which would allow the County to measure the effectiveness and potential GHG emission reductions that would occur. Mitigation also requires development to exceed the California Building Code Standards by meeting the minimum standards for Tier 1 and Tier 2 of the CALGreen Code, for nonresidential, multifamily, and single-family residential development, respectively. Energy efficient design features and solar photovoltaics may be used to achieve the necessary emission reduction requirements. LEED certification would be one option applicants can use to demonstrate compliance. Also, SAP Policy NR-6.7 has been revised as shown in Master Response 5: Greenhouse Gas Mitigation; the revised policy requires installation of solar photovoltaic systems and specific energy efficiency measures for new residential development.

- 29-3 The comment indicates that mitigation would not be required if buildings met zero net energy standards. See response to comment 29-1.
- 29-4 The comment references the Draft EIR's use of Placer County's mPOWER program and suggests that all project developers should be required to contribute to this program. This program will conclude at the end of 2019 and has been removed from the Draft EIR. (See Chapter 2, "Revisions to the Draft EIR," for the specific revisions.) However, this is not the only option for a local carbon offset that project applicants can invest in to comply with Mitigation Measure 4.7-2b. Such investments would be at the discretion of individual project applicants. Regardless of the carbon offset option chosen, all supporting evidence that the program meets the six required criteria (i.e., real, additional/surplus, quantifiable, enforceable, validated, and permanent) would be provided to the County prior to final map recordation or building permit issuance.

The comment also suggests that electric vehicle charging stations and bus electrification be required by the project to offset mobile-source emissions. As explained on page 4.7-20 of the Draft EIR, 10 percent of parking spaces at all multifamily residential buildings and all nonresidential buildings must include electric vehicle (EV) chargers. However, this amount of EV chargers would not fully offset the mobile-source emissions associated with the project. As described in response to comment 29-1, the California Energy Code does not require new residential or nonresidential buildings to be zero net energy under the 2019 standards, and thus, carbon offset credits are required to reduce the project's impact to climate change.

Bus electrification is considered infeasible at the project level because bus fleet purchases are made by transit authorities, such as Placer County Transit and Roseville Transit. The project would be committed to providing funds to local transit agencies through SAP policies and Draft EIR mitigation measures. See Master Response 5: Greenhouse Gas Mitigation. Further, CARB is in the process of developing a new regulation, the Innovative Clean Transit Regulation, that would require all public transit fleets to phase in zero emission buses, including battery electric and hydrogen fuel cell buses, such that all new fleet purchases are zero emission by 2030, prior to the buildout of the PRSP area. For these reasons, no revisions are necessary to the Draft EIR.

- 29-5 The comment suggests several GHG reduction measures. See Master Response 5: Greenhouse Gas Mitigation, which includes a discussion regarding the various GHG-reduction measures suggested by comments on the Draft EIR.
- 29-6 The comment 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.

February 19, 2019

VIA E-MAIL

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603
cdraecs@placer.ca.gov

Letter
30

RE: Comments on the Sunset Area Plan/Placer Ranch Specific Plan Draft Environmental Impact Report (State Clearinghouse No. 2016112012)

To whom it may concern:

Stanford Ranch I, LLC ("SR1") is the owner of Assessor's Parcel No. 017-250-076, an approximately 8-acre parcel located in the Foothills Business Park in the City of Roseville. This property is zoned for office/industrial use. SR1 has secured a 404 permit for filling wetlands on the property. In short, all development entitlements are in place.

Mitigation Measure 4.14-1b identified in the Sunset Area Plan/Placer Ranch Specific Plan Draft Environmental Impact Report (State Clearinghouse No. 2016112012) ("DEIR") requires the extension of Foothills Boulevard in the Sunset Area Plan area to connect with Foothills Boulevard in the City of Roseville to improve level of service on the local roadway network. The proposed alignment of this extension is via Duluth Avenue as depicted in DEIR Exhibit 3-7 (see Attachment 1) and as described in DEIR Section 3.8:

Foothills Boulevard (South). As indicated in Section 4.14, "Transportation and Circulation," Mitigation Measure 4.14-1b requires the extension of Foothills Boulevard, to connect with Foothills Boulevard in the City of Roseville to improve level of service on the local roadway network. To implement this mitigation measure, Foothills Boulevard would be extended through the existing Duluth Avenue alignment then south of the plan area to connect to the existing northern terminus of Foothills Boulevard (in the City of Roseville), which is a two-lane roadway. This extension would require a bridge to cross Pleasant Grove Creek and would consist of a four-lane arterial roadway with a 100-foot right-of-way and additional landscape corridors and public-utility-easement (PUE) dedications on each side of the roadway. This alignment would use the existing Duluth Avenue corridor to create a connection from the southern boundary of the plan area, across Pleasant Grove Creek, to the existing terminus in the City of Roseville. As shown in Exhibit 3-23 and discussed above, the portion of the Foothills Boulevard extension outside the SAP was previously evaluated in the Foothills Business Park Annexation EIR, certified by the City of Roseville in October 2000.

30-1

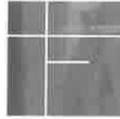
The DEIR does not address how or when the County will acquire, or the precise location of, the requisite right of way along Duluth Avenue, including along the SR1 property described above, to accommodate this alignment. Accordingly, SR1 respectfully requests these issues be addressed in the County's response to comments and in the Final Environmental Impact Report.

Sincerely,


Stanford Ranch I, LLC
By: Larry D. Kelley, Sr.
Its: Manager

Letter 30 | Stanford Ranch I, LLC
Larry D. Kelley, Sr., Manager
February 19, 2019

30-1 The comment requests information on when the County will acquire the right-of-way (ROW) for Foothills Boulevard on parcel 017-250-076. The parcel referenced has sufficient ROW to construct the ultimate facility and no further ROW will be needed for the Foothills Boulevard extension.



Letter
31

T R A I N O R F A I R B R O O K
A T T O R N E Y S A T L A W

Charles W. Trainor
ctrainor@trainorfairbrook.com

February 14, 2019

ELECTRONIC MAIL
AND FIRST CLASS MAIL

Steve Pedretti, Agency Director
Community Development Resource Agency
County of Placer
3091 County Center Drive
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ELECTRONIC MAIL
AND FIRST CLASS MAIL

Crystal Jacobsen, Principal Planner
Community Development Resource Agency
County of Placer
3091 County Center Drive
Auburn, California 95603
Email: CJacobse@placer.ca.gov

Re: Comments on the Sunset Area Plan and Draft Environmental
Impact Report for the Sunset Area Plan/Placer Ranch Specific Plan

Dear Mr. Pedretti and Ms. Jacobsen:

As you know, this law firm represents the United Auburn Indian Community ("UAIC"), the owner of the Thunder Valley Casino Resort ("Thunder Valley") and other properties within the Sunset Area Plan. As a governmental entity, UAIC appreciates the opportunity to review the Public Review Draft Sunset Area Plan (Draft SAP) and the Draft Environmental Impact Report (EIR) for the SAP/PRSP, and to provide comments thereto.

Comments on the Draft Sunset Area Plan

UAIC's comments on the Draft SAP are as follows:

- Western Placer Waste Management Authority Landfill: On page 1-8, the description of the Preserve/Mitigation Reserve (P/MR) land use designation includes mention of the Western Regional Sanitary Landfill as an appropriate use for this designation. If that is an appropriate use, it should be addressed in the discussion of "Land Use Buffer Standards" on pages 1-10 and 1-11. The SAP does not provide information on where the landfill could expand into the P/MR designated lands. Please remove this as a potential use for the P/MR designation and/or clarify the policies and standards regarding landfill expansion and buffering. In addition, the SAP should clearly state how much of the Eco-Industrial/ Manufacturing/WPWMA District would be available for any future landfill

31-1

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Steve Pedretti, Agency Director
 Crystal Jacobsen, Principal Planner
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expansion. Any expansion of the landfill toward Thunder Valley will be of concern to UAIC. 31-1
cont.

- Height Limit in EMU Zone: Within the SAP Implementing Zoning Regulations, *1.01.04 – Other Applicable Commercial and Entertainment Mixed-Use Zone Regulations*, the regulations allow for heights in the EMU zone up to 225 feet high. Since Thunder Valley is currently 227 feet high, we would request this limit to be increased to either 227 feet or 230 feet, so that Thunder Valley is not a non-confirming use. 31-2
- Some uses are defined in Section 1.05.02 of the Implementing Zoning Regulations, including food halls and mobile food truck plazas; however, these uses do not otherwise appear in the zoning regulations or Allowed Use and Permit Requirements tables, and should appear there. 31-3

Missing Appendices

- Page 9-3 of the Draft SAP mentions: "Appendix B of this Policy Document is the *Sunset Area Capital Improvement Plan (CIP)*." However, on the appendices divider page (just after page 2-28 of the Implementing Zoning Regulations) Appendix B is titled "Resolutions." Please provide the Capital Improvement Plan to allow for appropriate review and comment. 31-4
- Page 9-5 of the Draft SAP mentions: "These costs are addressed by the Sunset Area Infrastructure Finance Strategy (Appendix C)." However, no Appendix C is present and there are no public documents on the website showing the finance strategy. Please provide the Sunset Area Infrastructure Finance Strategy to allow for appropriate review and comment.

Utilities

- The Draft SAP does not show the utilities plans. Please provide the plans for utilities for appropriate review and comment. 31-5
- Assuming that the EIR correctly indicates that wastewater plan in Figure 3 of the Draft EIR's Appendix B (*Sunset Area Water, Wastewater, and Recycled Water Technical Report*), UAIC requests reconsideration of the routing of the Proposed Gravity Maine Pipeline down Athens Avenue between Industrial Avenue and Fiddymment Road. The current routing between Foothills Boulevard and Fiddymment Road, and then down Fiddymment Road to Placer Ranch, passes primarily through the Preserve/Mitigation 31-6

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Reserve and the landfill, not through an area of development where landowners could better support, utilize and pay for the system at a lower cost. Please consider the benefits of turning the Main Pipeline down Foothills Boulevard at Athens Avenue to the south to Placer Ranch where it would be supported by the landowners on each side of Foothills Boulevard, saving expense and causing less of an environmental effect.

31-6
 cont.

Comments on the Draft Environmental Impact Report for the Sunset Area Plan/Placer Ranch Specific Plan

Off-Reservation Study/Environmental Review

UAIC is planning for the buildout of Thunder Valley, and the associated entertainment and recreational facilities. A tribal environmental impact report was certified in 2009 and three subsequent addenda have been published since, as listed below:

- Thunder Valley Casino Expansion Final Tribal Environmental Impact Report (TEIR), June 2008 (SCH: 2007062072)¹
- Thunder Valley Casino Expansion TEIR Addendum, August 2009²
- Thunder Valley Casino Expansion TEIR Addendum 2, March 2016³
- Thunder Valley Casino Expansion TEIR Addendum 3, May 2017⁴

31-7

Please confirm that full buildout of Thunder Valley and the entertainment and recreational facilities, as approved under the TEIR and its subsequent addenda (including traffic, utilities, public services, alternatives, etc.), is properly considered throughout the EIR, and is not in conflict with the TEIR.

¹ Analytical Environmental Services (AES), 2008a. Thunder Valley Casino Expansion Draft Tribal Environmental Impact Report. February 2008.

AES, 2008b. Thunder Valley Casino Expansion Revised Draft Tribal Environmental Impact Report. June 2008.
 AES, 2008c. Thunder Valley Casino Expansion Final Tribal Environmental Impact Report. June 2008.

² AES, 2009. Thunder Valley Casino Expansion Tribal Environmental Impact Report Addendum. August 2009.

³ Environmental Science Associates (ESA), 2016. Thunder Valley Casino Expansion Tribal Environmental Impact Report Addendum 2. March 2016

⁴ Environmental Science Associates (ESA), 2017. Thunder Valley Casino Expansion Tribal Environmental Impact Report Addendum 3. May 2017

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Project Description

- Pages 3-5, 4.10-3: EIR incorrectly identifies Thunder Valley Casino Resort as having 297 hotel rooms. The correct number is 408 rooms (per February 28, 2018, letter to County). 31-8
- Page 3-15, Table 3-1: Make changes to the table to reflect the maximum 2.00 FAR in the Entertainment Mixed-Use Designation, as shown in Table 1-1 in the Draft SAP. 31-9
- Multifamily residential development in EMU designation: On page 3-15, Table 3-1 shows that multifamily residential development is allowed in the EMU designation at up to 30 dwelling units (dus) per acre. Furthermore, on page 3-11 (as well as page 1-3 of the SAP), the EIR states: "The EMU designation also anticipates the potential need for residential uses to support the workforce employed in the area." On page 3-16, the EIR states: "In particular, the EMU designation is expected to generate the need for workforce housing... Accordingly, [this] [designation] include[s] standards that assume between 10 and 30 dwelling units per net acre, respectively, for areas proposed for housing." UAIC supports allowing up to 30 dus/acre in the EMU land use designation. However, on page 6-4, Table 6-1, the EIR assumes no multifamily residential development in the Net SAP area. The EIR should consider and analyze the potential environmental effects that, at buildout, the EMU designation would include a certain amount of multifamily residential development. 31-10
- Page 3-28, Table 3-3: Please confirm that full buildout of the casino and entertainment facilities, as approved under the TEIR and subsequent addenda, is included in the 2,615 ksf assumed for Phase 1 buildout of the SAP in the EMU land use designation. 31-11
- Page 3-14, Preserve/Mitigation Reserve: The description of the Preserve/Mitigation Reserve land use designation includes mention of the Western Regional Sanitary Landfill as an appropriate use for this designation. The Project Description does not provide information on where the landfill could expand into this area. As stated in the February 28, 2018 letter to the County, any expansion of the landfill toward Thunder Valley will be of concern to UAIC. 31-12
- Project Description: There is no mention of the Western Regional Sanitary Landfill's future plans to expand. This expansion is of concern and the potential for such an expansion should be disclosed in this document, along with a map showing the current location and the proposed expansion area. Page 3-29 mentions a "proposed 2,000-foot landfill buffer". There is no map showing where this landfill buffer is located. Page 4.8-35 states "The proposed SAP includes reduction of the 1-mile landfill buffer to 2,000 feet 31-13

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for residential uses, or as close as 1,000 feet with approval of a specific plan, master plan, or development agreement." Where is this buffer and how does the expansion of the landfill affect the surrounding development?

31-13
 cont.

Cultural

- Pages 4.5-5 through 4.5-11 - Tribal Cultural Resources.

Appendix B of the EIR (Sunset Area Water, Wastewater, and Recycled Water Technical Report – Wastewater Treatment Report)

UAIC presently operates its own wastewater treatment facility, but will, when public sewer is available in Athens Avenue, most likely want to utilize that public utility and close its own wastewater treatment facility. Please confirm with technical personnel that they have taken into account Thunder Valley and the Tribe's other properties in the design of the wastewater treatment system for the SAP.

31-14

Alternatives

As stated previously, UAIC supports adoption of the proposed project, with its requested changes. However, the alternatives to the project must also be feasible and provide enough information to provide a certain level of certainty to landowners on the repercussions of approval of any of the alternatives. In addition, the buildout of the casino and entertainment facilities consistent with the TEIR and subsequent addenda should be reflected in all alternatives.

31-15

- Alternative 1: No-Project–1997 SIA Plan Alternative
 - Page 6-10, Table 6-3: The 81 ksf shown in the retail land use type is not sufficient to reflect the full buildout of the casino and entertainment facilities.
 - Page 6-10: The text and Table 6-3 should reference the full buildout of the casino and entertainment facilities as part of the "no project" conditions.

- Alternative 2: Reduced Scale

- UAIC does not support this alternative. Under this alternative, the EIR assumes that maximum building heights would be reduced to 60 feet. As stated previously, UAIC contends that the maximum building height in the EMU/AD zone should be at least 225 feet.
- The EIR assumes a transition zone for this alternative that would require a single-story maximum height within 500 feet of an existing preserve or land outside the

31-16

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SAP, 100-foot landscaped buffer, and 100-foot landscaped greenbelt. However, the EIR does not include a map showing where these would be located. Please include a map that shows what areas would be affected by the transition zone and buffer requirements.

31-16
 cont.

- The EIR asserts that this alternative would result in reduced aesthetic impacts. However, the 227-foot casino hotel tower is already developed. Individual perception of aesthetic impacts may differ greatly. UAIC does not agree that a reduced height alternative would result in lesser aesthetic impacts.
- Alternative 3: Reduced Footprint, Reduced Development Potential
 - Page 6-17, Exhibit 6-2: In this alternative, UAIC-owned land would be preserved as part of the Preserve/Mitigation Reserve land use designation. In addition, the total allowable square footage of development in the EMU district would drop by 275 ksf to 2,340 ksf. UAIC does not support this alternative. This alternative would reduce developable land owned by the Tribe and isolate the casino from other future uses. UAIC is not in favor of any alternative that reduces its ability to develop properties it owns, thereby reducing UAIC's self-sufficiency.
- Alternative 4: Reduced Footprint, Similar Development Potential
 - Page 6-23, Exhibit 6-3: In this alternative, UAIC-owned land would be preserved as part of the Preserve/Mitigation Reserve land use designation.
 - While the EIR states that this alternative does not reduce development potential, there are no assurances on how the development potential would remain. In order to maintain the development potential, the plan must account for increased FAR and building heights. Please clarify what measures would be put into place to ensure that overall development potential is not decreased. More definition of this alternative is needed to provide certainties on the potential constraints.
 - UAIC does not support this alternative. This alternative would reduce developable land owned by the Tribe and isolate Thunder Valley from other future uses and surrounding development. UAIC is not in favor of any alternative that reduces its ability to develop the properties it owns, thereby reducing UAIC's self-sufficiency.
- Alternative 5: Reduced VMT

31-17

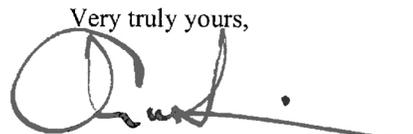
31-18

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- Page 6-25: This alternative assumes no nonresidential development in the EMU designation. As already discussed previously, the EIR (Table 6-1) assumes no multifamily residential development in the EMU designation (or anywhere outside of the PRSP). Table 6-6 also shows no multifamily residential development outside the PRSP. This is not a feasible alternative as it would remove most (if not all) development potential from UAIC-owned property.
- Page 6-25, Table 6-6: This alternative incorrectly assumes no development in the EMU designation. At the very least, this alternative must reflect full buildout of the casino and entertainment facilities, and those rights it has under the existing TEIR.
- UAIC does not support this alternative. This alternative would reduce developable land owned by the Tribe and isolate Thunder Valley from other future uses and surrounding development. UAIC is not in favor of any alternative that reduces its ability to develop properties it owns, thereby reducing UAIC's self-sufficiency.

31-18
 cont.

Our client looks forward to continuing government-to-government discussions on this important project with the County.

Very truly yours,

 Charles W. Trainor

CWT:skc
 3671053.1739943.1

Letter 31 | United Auburn Indian Community
 Trainor Fairbrook
 February 14, 2019

- 31-1 The comment notes that the Western Regional Sanitary Landfill is incorrectly referenced on page 1-8 of the SAP in the description of the Preserve/Mitigation Reserve Land Use Designation description. This reference on page 1-8 of the SAP notes that the Western Regional Sanitary Landfill's proximity to the Preserve/Mitigation Reserve Land Use Designation provides a buffer between preserve/mitigation lands and incompatible uses. It is not listed as a use anticipated within the Preserve/Mitigation Reserve Land Use Designation.
- 31-2 The comment requests that the height limit in the SAP EMU zone district be increased to either 227 or 230 feet so that the Thunder Valley (casino) is not a non-conforming use. The project description currently allows for up to 225 feet in the EMU zone district for certain uses. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration.

- 31-3 The comment notes that some new uses defined in Section 1.05.02 of the SAP Implementing Zoning Regulations do not appear in the allowed use tables for any zone district. The omission of these uses in the allowed use tables was made in error. These uses have been added to the EMU and IC zone district in the Final SAP.
- 31-4 The comment notes that there is a discrepancy with the title for Appendix B of the SAP. This error has been corrected in the Final SAP. The comment also requests for the Capital Improvement Plan be provided early enough to allow for appropriate time to allow for review and comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration.
- 31-5 The comment suggests that the SAP does not include a utilities plan. The SAP policy document does not contain a utilities plan; however, utility plans for the SAP are included within the Sunset Area Water, Wastewater, and Recycled Water Technical Report which is included in Appendix B of the EIR.
- 31-6 The comment asks the County to consider another alignment for the sewer line. The sewer alignment is based on the preferred option from the Sewer Service Analysis for the Area Surrounding Athens Avenue study.
- 31-7 The comment asks whether full buildout of Thunder Valley and the associated entertainment and recreational facilities is properly considered in the Draft EIR. The Thunder Valley Expansion EIR (June 2008) and its addenda (August 2009, March 2016, and May 2017) cover the UAIC property north of Athens Boulevard and the overflow parking area south of Athens Boulevard. The expansion project, including the hotel, casino, and parking structure, was completed prior to commencement of the Draft EIR, so it is included in the existing conditions baseline, as is the outdoor amphitheater. Future development of the overflow parking lot and all other EMU-designated parcels south of Athens Boulevard and east of Foothills Boulevard is, however, covered by the Phase 1 EMU development capacity described in Table 3-3 in the Draft EIR.
- 31-8 The comment provides a correction to the number of hotel rooms at Thunder Valley Casino Resort. In response to this comment, the second paragraph on page 3-5 of the Draft EIR is revised as follows:

There have, however, been some business expansions and new development activity during this time within the plan area. Thunder Valley Casino Resort, located at the intersection of Athens and Industrial Avenues, is the largest new development activity within the plan area since 1997, having expanded to become a full-service casino with a ~~297408~~-room hotel, spa, concert, and gaming facility. Additionally, some core industrial uses have started to take hold in the southeastern corner of the plan area.

In response to this comment, the second full paragraph on page 4.10-3 of the Draft EIR is revised as follows:

The plan area experienced some business expansions and new development activity since 1997. Thunder Valley Casino Resort, located at the intersection of Athens and Industrial Avenues, is the most significant new development in the plan area since 1997, now with a ~~297408~~-room hotel, spa, concert venue, restaurants, and gaming facility. Additionally, some core industrial uses have been developed in the southeastern portion of the plan area.

These revisions constitute minor clarifications and do not affect the analysis or conclusions of the Draft EIR.

31-9 The comment points out a discrepancy between Table 3-1 in the Draft EIR and the SAP in the FAR for the EMU land use designation. This discrepancy was made in error. In response to this comment, Table 3-1 on page 3-15 of the Draft EIR is revised as follows:

Table 3-1 SAP Development Density by Land Use Designation

Land Use Designation	Acres	Floor Area Ratio		Dwelling Units per Acre
		Low	High	
General Commercial	34.2	0.15	0.75	-
Entertainment Mixed-Use	516.8	0.15	1.00 <u>2.00</u>	10-30
Business Park	147.3	0.20	0.50	-
Innovation Center	1,244.7	0.20	0.50	10-30
Eco-Industrial	927.4	0.20	0.60	-
Light Industrial	749.9	0.20	0.50	10-30
Public Facility	6.3	-	-	-
Preserve/Mitigation Reserve	1,943.4	-	0.02	-
Urban Reserve	320.4	-	0.02	-
PRSP	2,213.3	See Table 3-4	See Table 3-4	See Table 3-4
Total	8,103.7			

Source: Information provided by Mintier Hamish in 2017

This correction does not result in changes to the Draft EIR analysis or conclusions. No further revision to the Draft EIR is necessary.

31-10 The comment notes that Table 6-1 in the Draft EIR assumes no multi-family residential development in the net SAP area. This omission was made in error. In response to this comment, Table 6-1 on pages 6-4 and 6-5 of the Draft EIR is revised as follows:

Table 6-1 Project Development at Buildout

Land Use Type	PRSP Area	Net SAP Area	Total Project Area
Single-Family Residential ¹	3,082 du	2,460 <u>0</u> du	5,542 <u>3,082</u> du
Age-Restricted Residential	1,050 du	0 du	1,050 du
Multifamily Residential ²	1,504 du	0 <u>2,458</u> du	1,504 <u>3,962</u> du
Retail ³	1,640 ksf	220 ksf	1,860 ksf
Office ⁴	1,241 ksf	1,110 ksf	2,351 ksf
Industrial ⁵	1,658 ksf	11,440 ksf	13,098 ksf
Innovation Center/R&D ⁶	901 ksf	12,000 ksf	12,901 ksf
Entertainment Mixed Use	0 ksf	3,060 ksf	3,060 ksf
University	30,000 students	0 students	30,000 students
Public Facilities	10.3 ac	6.3 ac	16.6 ac
Parks/Open Space	69.8 ac	0.0 ac	69.8 ac

Table 6-1 Project Development at Buildout

Land Use Type	PRSP Area	Net SAP Area	Total Project Area
Preserve/Mitigation Areas	264.8 ac	2,263.8 ac	2,528.6 ac

Notes: ac = acres; du = dwelling units; ksf = 1,000 square feet; R&D = research and development.

¹ All medium-density residential uses are assumed to be single-family (rather than multifamily) residential.

² All high-density residential uses are assumed to be multifamily residential.

³ All commercial uses (General Commercial, commercial components of Commercial Mixed Use and Campus Park) assume a highest trip-generating condition of 100% retail space.

⁴ Office uses include office components of Commercial Mixed Use and Campus Park in the PRSP area and Business Park in the remainder of the SAP area.

⁵ Industrial uses include light industrial and warehouse components of Campus Park in the PRSP area and light industrial and eco-industrial land uses in the remainder of the SAP area.

⁶ Innovation Center/Research & Development include the Research & Development component of Campus Park in the PRSP area and Innovation Center in remainder of the SAP area.

Source: Information provided by MacKay & Soms and Mintier Hamish and compiled by Ascent Environmental in 2018

This correction does not result in changes to the Draft EIR analysis or conclusions. No further revision to the Draft EIR is necessary.

- 31-11 The comment requests confirmation that the full buildout of the casino and entertainment facilities is included in the 2,615 KSF assumed for the SAP in Table 3-3 in the Draft EIR. See response to comment 31-7, above, regarding how the Draft EIR considers full buildout of Thunder Valley.
- 31-12 The comment notes that the WRSL is incorrectly referenced on page 3-14 of the Draft EIR. This reference on page 3-14 of the Draft EIR notes that the Western Regional Sanitary Landfill's proximity to the Preserve/Mitigation Reserve Land Use Designation provides a buffer between preserve/mitigation lands and incompatible uses. It is not listed as a use anticipated within the Preserve/Mitigation Reserve Land Use Designation.
- 31-13 The comment notes that the Draft EIR does not reflect the WRSL's future expansion plans. At the time of release of the NOP for the Draft EIR, the specific expansion plans for the landfill were unknown and therefore not described specifically in the Draft EIR analysis. However, the expansion is identified in the Draft EIR's cumulative projects list. See Table 4.0-2 and Exhibit 4.0-1. The comment also asserts that there is no map included in the Draft EIR depicting the SAP proposed sanitary landfill buffers. SAP Figure 1-3 includes a map of the SAP proposed land use buffers. To provide greater clarity, the Draft EIR has been modified to include this map as Exhibit 3-27. See Chapter 2, "Revisions to the Draft EIR," for revised Exhibit 3-27.
- 31-14 The comment requests confirmation that Thunder Valley and the Tribe's other properties have been accounted for in the design of the wastewater treatment plan for the SAP. The Sewer Service Analysis for the Area Surrounding Athens Avenue study includes 47 acres of Thunder Valley Casino to the north of Athens Avenue and all areas south of Athens Avenue. No revisions to the Draft EIR are necessary.
- 31-15 The comment requests changes to Alternative 1: No-Project—1997 SIA Plan Alternative. The No Project—1997 SIA Plan Alternative provides development capacity data based on information in the 1997 SIA Plan. The information presented in the No Project—1997 SIA Plan Alternative is not based on individual planned projects/expansions (other than the development specifically identified in the 1997 SIA). This is consistent with CEQA requirements, as described above in response to comment 16-1. It should be noted that the approval of the No-Project—1997 SIA Plan Alternative would mean that the proposed project would not move forward and the existing 1997 SIA Plan would remain in place. No additional development restrictions would occur, beyond those currently in place, as a result if the No Project—197 SIA Plan Alternative were implemented.

See Master Response 1: Alternatives Analysis for information regarding the overall adequacy of the Draft EIR's alternatives analysis.

- 31-16 The comment expresses opposition to and concerns with Alternative 2: Reduced Scale. The comment requests that the height restriction under the alternative be increased from 60 feet to 225 feet. However, this would defeat the purpose of the alternative, which seeks to reduce significant aesthetic impacts of the project related to changes in site character by reducing the scale of development. No changes to the Draft EIR are necessary.

The comment also requests a graphic to show where height restrictions and landscape buffers would be applied along existing and proposed preserves, and near land outside the SAP area designated for long-term agricultural use. Because future preserve areas within the SAP area would be primarily required as a matter of policy applied to individual development projects, a map cannot be generated showing these areas. The Draft EIR includes graphics showing existing preserves (Exhibit 4.4-1). The land outside the SAP area designated for long-term agriculture exists primarily along the northwestern edge of the SAP area near the Urban Reserve District and the Innovation District (see Exhibit 3-4). Most other SAP properties adjacent to land designated agricultural are within the SAP's Preserve/ Mitigation Reserve District. Because a map cannot be produced for some of the criteria and because the other criteria are straightforward and do not require illustration, no revisions to the Draft EIR are necessary.

See Master Response 1: Alternatives Analysis for information regarding the overall adequacy of the Draft EIR's alternatives analysis.

- 31-17 The comment expresses opposition to and concerns with Alternative 3: Reduced footprint, Reduced Development Potential. The comment provides reasons that it is opposed to the alternative, primarily based around a reduction in the land and development potential in the EMU, but the comment does not identify any flaws with the alternative related to feasibility, or any issues with the environmental analysis related to the alternative. These comments will be taken into consideration by decisionmakers when deliberating on the SAP/PRSP. See Master Response 1: Alternatives Analysis for information regarding the overall adequacy of the Draft EIR's alternatives analysis. No changes to the Draft EIR are necessary.

- 31-18 The comment expresses opposition to and concerns with Alternative 4: Reduced Footprint, Similar Development Potential and Alternative 5: Reduced VMT. Regarding Alternative 4, the comment suggests that no assurances are provided regarding how the alternative would maintain development potential. Although "assurances" are not required by CEQA for an alternatives analysis, a similar level of development potential as the project would be maintained by allowing increased net density of development, as stated in the Draft EIR (page 6-21). Regarding Alternative 5, the comment indicates that the development assumptions in the EMU are incorrect/infeasible, due to lack of multifamily residential development. The County does not consider the changes to the EMU as rendering the alternative infeasible, although it does impinge on the alternative's ability to meet project objectives. Although the commenter does not support these alternatives, they are appropriate for consideration in the Draft EIR. See Master Response 1: Alternatives Analysis for information regarding the overall adequacy of the Draft EIR's alternatives analysis. No revisions to the Draft EIR are required.

From: Bj <bjmakesithappen@aol.com>
Sent: Sunday, January 13, 2019 8:22 PM
To: Shirlee Herrington; EJ Ivaldi; Christopher Schmidt; Crystal Jacobsen; Kally Keding-
 Cecil
Subject: Strongly opposed to Whitehawk Development in Granite Bay

Letter 32

Due to the government shut down, several key offices related to the environment and housing are closed. I am respectfully requesting a reasonable time extension on my behalf and on behalf of those who feel strongly about commenting on DEIR's recently released.

Comments for WHI and II are due by 5:00 pm 1/14. This MASSIVE 740+ page document with appendices as long as 400+ pages for traffic. This length far exceeds the intent to clearly and easily communicate the impacts for projects totally roughly 80 homes.

CEQA 15141 states: "The text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300."

The County has "dumped" 3 DEIR's upon the public in an unreasonable time-frame. These documents contain massive sections of repetitive text, analyses which require keeping multiple tabs open to tie back to number and letter references, use vague language, rely on project economic feasibility and inadequately provide clear and recommended 3D imagery depicting the project from reasonable angles. The intent of these EIR's appear to be to confuse, belabor and hide very significant impacts in direct conflict with the intent of DEIRs.

The Placer Retirement Residence DEIR exceeds recommended length and offices associated with licensing of senior and assisted living facilities are closed due to the shutdown. Impacts for the SIA/PR project are far reaching and of significant impact on the entire county. This project will destroy thousands of acres of farmlands, wetlands, destroy endangered vernal pools, mitigate off-site endangered species = "kill and pay an in-lieu fee", and add to traffic corridors with 10,000 addition homes without providing adequate affordable housing. Information from departments involved in affordable housing and the destruction of endangered species are closed, as such, we the public are being denied access to critical information that would allow for pertinent and accurate statements.

This page limit recommendation is to allow the public to CLEARLY and EASILY understand the environmental impacts of a project. Since these guidelines have been blatantly ignored, the intent of the documents to provide an opportunity to understand the projects impacts should be extended to afford the community its guaranteed right to comment.

Thank you in advance for your consideration of my request.

BJ Baker
 Waterford II HomeOwners Assoc.
 Assistant Secretary

32-1

32-2

32-3

Letter 32	Waterford II Homeowners Association B.J. Baker, Assistant Secretary January 13, 2019
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- 32-1 The comment raises issues related to the government shutdown. See response to comment 11-1, which addresses this issue in detail.

A portion of the comment (including the subject line) references the Whitehawk I and II Projects in Granite Bay, for which the County issued a Draft EIR in November 2018 and a Final EIR in February 2019. These projects are not associated with the SAP/PRSP or EIR. Nevertheless, the comment also speaks to the number of EIRs issued by the County in the same timeframe and the length and complexity of the documents.

Section 15105(a) of the State CEQA Guidelines requires that Draft EIRs are circulated for a minimum of 30 days, unless state agency review is required, in which case the review period must be 45 days (with certain exceptions). The Draft EIR was circulated for public review and comment for a period of 64 days, from December 18, 2018 to February 19, 2019. The County did receive one comment letter within a week after the close of the review period, and while the County is not obligated under CEQA to respond to late comments, the County is nonetheless providing responses in this Final EIR to that late comment letter (these are included in this Final EIR under the category, "Late Comments"). Any comment received over a week after the close of the review period are not included in the Final EIR, but responses will be provided in the staff report package that will be provided to the Placer County Planning Commission and Board of Supervisors.

The comment expresses concern about the number of EIRs issued by the County in the same timeframe and the length and complexity of the documents, implying that the comment period should have been extended. Section 15141 of the State CEQA Guidelines states that Draft EIRs should normally be less than 150 pages, and Draft EIRs of unusual scope or complexity should normally be less than 300 pages. These recommended maximum document lengths are provided as general guidance, not limitations. Page lengths differ for each EIR and will typically be longer for program EIRs such as this one, which includes both program- and project-level components. The County extended the public review period from its typical 45 days to 67 days and believes this is sufficient to comment on the Draft EIR. The public review period complies with CEQA requirements.

- 32-2 A portion of the comment references the Placer Retirement Residence Project in Granite Bay, for which the County issued a Draft EIR in December 2018 and a Final EIR in March 2019. This is a separate project and is not associated with the SAP/PRSP or EIR. Nevertheless, the comment also speaks to the number of EIRs issued by the County in the same timeframe and the government shutdown that overlapped with the comment periods. See response to comment 11-1 regarding the government shutdown and the public's ability to provide comments.
- 32-3 The comment reiterates concerns expressed above about page limits and requests an extension of the comment period. See response to comment 32-1, above, regarding these topics.