

### 3.2.3 Individuals

**From:** Amber Beckler <zagnut@hotmail.com>  
**Sent:** Sunday, January 13, 2019 4:04 PM  
**To:** Shirlee Herrington; EJ Ivaldi; CRSchimd@placer.ca.gov; Crystal Jacobsen; KKeding@placer.ca.gov  
**Subject:** Request for extension on WH I and II

<b>Letter 33</b>
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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.

Thank you,

Amber Beckler  
 8970 Benton Acre Rd  
 Granite Bay, CA 95746

33-1

<b>Letter 33</b>	Amber Beckler January 13, 2019
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33-1 This comment letter is virtually the same as the content of comment letter 32. See responses to comments 32-1 through 32-3.



**From:** Cheryl Berkema <cheryl.berkema@gmail.com>  
**Sent:** Monday, January 14, 2019 11:56 AM  
**To:** Shirlee Herrington; EJ Ivaldi; Christopher Schmidt; Crystal Jacobsen; Kally Keding-Cecil; Clayton Cook  
**Subject:** Request for extension of Environmental Document Reviews

<b>Letter</b> <b>35</b>
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Good morning,

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 at the same time for public review and input: The Sunset Area Plan/Placer Ranch Specific Plan, Placer County Government Center Master Plan Update, WhiteHawks I & II DEIR, and Placer Retirement Residence DEIR. 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.

Several residents have expressed concerns with the timing of multiple environmental documents, the excessive length of the documents, the complexity of the environmental documents, and Placer hearings scheduled so close to religious holidays. Resident appeals to postpone the documents and extend these document deadlines has also been expressed in public meetings. In addition to the environmental documents released at the same time, the WhiteHawks Planning Hearing, the Zoning Text Amendment Board of Supervisors Hearing and Tiny Houses on Wheels Board of Supervisors hearing were scheduled placing heavy burden on residents.

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.**"

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,  
 Cheryl Berkema

35-1

<b>Letter</b> <b>35</b>	Cheryl Berkema January 14, 2019
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35-1 This comment letter is virtually the same as the content of comment letter 32. Therefore, this response simply cross-references to responses to this letter. See responses to comments 32-1 through 32-3.

**From:** Cheryl Berkema <cheryl.berkema@gmail.com>  
**Sent:** Monday, February 18, 2019 2:26 PM  
**To:** Shirlee Herrington  
**Cc:** Cheryl Berkema  
**Subject:** Sunset Area Plan Feb 14 Hearing Comments

<b>Letter</b> <b>36</b>
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Hi Shirlee,

Enclosing the comments that I read in person at the Placer County Hearing Feb 14, 2014. Please add these to the administrative record.

February 14, 2019

Placer County Planning Commission  
 3091 County Center Drive #140  
 Auburn, CA 95603  
 Subject: Sunset Area Plan hearing  
 Attn: Shirlee Herrington, Environmental Coordinator ([sherring@placer.ca.gov](mailto:sherring@placer.ca.gov))

Placer County Planning Commission:

In December 2018, several concerned citizens made public and written requests of Placer Planning that the many significant projects being introduced by Planning be rescheduled and staggered appropriately to allow adequate time for public review. Time extensions were also requested for the projects due to the excessive document sizes, which were far beyond CEQA guidelines for documents, many of these projects were thousands of pages in length. In addition, several major hearings were also scheduled within the same timeframe completely inundating the public. The Sunset Area Plan, the largest regional project known to Placer County was introduced during this onslaught of document dumping, again, completely overwhelming the public. The Sunset Area Plan is a project a decade in the making. The Sunset Area Plan document was so large that the County had to get a waiver from the State Clearinghouse to divide it into multiple pieces as there is a 300-page limit for documents. Additionally, The Sunset DEIR review period was also during a federal shutdown prohibiting inquiries on housing, transportation, federal environment issues, and for the Placer County Conservation Program.

CEQA's purpose is to (1) inform governmental decision-makers and the public about potentially significant environmental effects of proposed projects, (2) identify ways that environmental damage can be avoided or significantly reduced, (3) prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures, and (4) disclose to the public the reasons why a governmental agency approved the project if significant environmental effects are involved. Why is Placer Planning putting up roadblocks for residents to adequately review and provide informed comments on a project of such importance as CEQA requires?

The Sunset Industrial Area Plan previously proposed by Placer County a decade ago made great promises, however the project objectives were never realized. The Sunset Industrial Area Plan was shown to not be economically feasible. That huge associated project price tag to present the project was picked up by Placer County residents. Placer County is introducing a similar proposal and expecting different results. How and when do we expect Placer County to be paid back for these expenditures from developers?

The Sunset Area Plan is a Hodge podge of disjoint components assembled together largely to create a tax revenue base for Placer County and to benefit wealthy developers. The Sunset Area Plan is reminiscent of the urban sprawl projects of the 20th century, not a forward-looking project that has citizen's and environmental needs of the 21st century at the forefront.

36-1

The Sunset Area Plan as proposed is deficient in the following areas:

- No developers have committed to the Sunset Area plan putting the county (and taxpayers) at significant risk. The County being the applicant and approver is a conflict of interest.
- The County has failed to show that the project is economically feasible.
- No innovators were mentioned in the DEIR. Stating you are creating an innovation center does not mean they will come.
- No University has committed to the Sunset Area Plan. Conversely, universities have backed out of the plan. This presents significant risk to the project financials and does not meet the project objectives.
- Would destroy significant vernal pools, habitats, and endangered species.
- Will create a new affordable housing crisis. Hourly workers will not be able to afford housing in the Sunset area. Not only does this compound the housing crisis, it increases the vehicle miles traveled, as workers will need to travel to work in the Sunset Area.
- Will not create the jobs that are projected. The County has failed to show where these jobs are expected to come from.
- Will create close to a million daily vehicle trips a day. This also fails to meet project objectives.
- Is not energy efficient, will produce excessive greenhouse gas emissions, The Sunset Area Plan does not provide alternative sources of energy.
- CEQA does not allow the promise of future action associated with mitigation measures that are currently not feasible because the Placer County Conservation Program (PCCP) has not been adopted. Current laws should be referenced as mitigation measures.
- A huge number of significant impact mitigations are not funded, so cannot be viewed as feasible nor valid.

36-2

A project of this magnitude requires much more than a workshop, a public hearing and an article in the Sacramento Bee. Citizens should seriously question the urgency for pushing this project through and the lack of public outreach that the County has provided to the Sunset Area Plan. Placer County has already spent millions of tax payer dollars on implementing sections of the Sunset Area Plan- a plan that has not been approved or reviewed by the public. The Sunset Area plan, a project of regional significance has not been socialized with Placer residents.

I request that you consider the process that has been used to deliver the Sunset Area Plan as insufficient and recirculate the Sunset Area Plan DEIR with the Citizens Initiated Smart Growth Plan as an alternative on the Draft EIR with the minimum 2019 CEQA 120-day review period to allow full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan. This Plan is environmentally superior to the proposed project and meets County objectives as set forth in the Draft EIR.

36-3

You the Placer County Planning Commissioners have the opportunity to create something special for Placer County. A world class master planner that has designed for some of the most innovative companies in the world has created a vision for an ecosystem that can resonate with citizens, be less impactful on the environment and set example for projects to follow. This is a gift to Placer County. I hope you recognize the opportunity.

It was disappointing to hear Placer Planning claim during the presentation that the Significant and Unavoidable impacts were out of their jurisdiction and control. For the ~45 pages of DEIR impacts, CEQA and NEPA require responses to these impacts and analysis, to fail to do so would be in violation of State and Federal law.

Thank you for the opportunity to provide comments on the DEIR and process.  
Sincerely,

Cheryl Berkema

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<b>Letter</b> <b>36</b>	Cheryl Berkema February 18, 2019
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- 36-1 The comment describes that requests have been previously submitted to the Placer County Planning Commission asking that Placer County projects be rescheduled and staggered to allow adequate time for public review. CEQA requires a public review period of 45 days for EIRs that require state agency review, which was met and exceeded by the County with the provision of a 67-day review period for the project. There is no basis under CEQA to extend that timeframe.

Regarding the comment that the SAP document was so large that the County received a waiver from the State Clearinghouse to divide it into multiple pieces, this is incorrect. Many EIRs exceed 300 pages, especially EIRs evaluating the impacts of large and/or complex project. The State Clearinghouse does not require a waiver.

Regarding the comment that the Draft EIR review period occurred during a federal shutdown, prohibiting public inquiries on housing, transportation, federal environmental issues, and the PCCP, see response to comment 32-1. Also, see response to comment 11-1 regarding the potential effect of the federal government shutdown to constrain federal agencies' ability to provide comments on the Draft EIR.

Regarding the comment that the SIA Plan is not economically feasible, a market study was prepared by EPS, which evaluated the economic viability of the PRSP and SAP. The market study did not conclude that the PRSP or SAP was economically unviable, although it did identify a buildout period of over 80 years for the full SAP. The Draft EIR uses this buildout assumption throughout the environmental analysis for the SAP. However, the comment primarily raises issues regarding the County's investment in the plan. This is not an environmental issue and no further response is required regarding this issue.

The remainder of the comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIR. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions into consideration when making a decision regarding the project.

- 36-2 The comment lists the areas in which the SAP is purportedly deficient. Many of the items in this list relate to the merits of the project and do not raise environmental issues or issues with the adequacy of the Draft EIR. This response will focus on the items that relate to environmental issues.

The comment suggests the project would destroy significant vernal pools, habitats, and endangered species. The impacts related to biological resources are disclosed in Section 4.4, "Biological Resources." The Draft EIR concludes that impacts related to vernal pools and aquatic habitat and impacts to special-status species would be significant and unavoidable after implementation of mitigation measures identified. The comment does not raise issues with these conclusions or with the analysis of the Draft EIR.

The comment indicates that the project would create close to one million daily vehicle trips and suggests that this conflicts with project objectives. Trip generation for the Cumulative Plus SAP Buildout is provided in Table 4.14-35 in Section 4.14, "Transportation and Circulation," of the Draft EIR. The daily trip total is 561,635. The comment does not raise issues with the Draft EIR's conclusions or analysis.

The comment raises issues with the project's energy efficiency and GHG generation. The Draft EIR includes a thorough analysis of the project's GHG generation and energy efficiency in Sections 4.7 and 4.16, respectively. The comment does not raise issues with the Draft EIR's analysis or conclusions.

The comment suggests that mitigation measures related to the PCCP are infeasible because the PCCP has not been adopted. Mitigation measures in Section 4.4., “Biological Resources,” that require mitigation under the PCCP include a separate set of measures that would be required in the case that the PCCP, including the Western Placer CARP and associated USACE programmatic permits, are not adopted, or are not available as a permitting and mitigation strategy for future projects. Therefore, the feasibility of mitigation measures included in the Draft EIR is not dependent on adoption of the PCCP. More details related to this issue are provided in Master Response 3: Placer County Conservation Program and Mitigation.

The comment suggests that mitigation measures are infeasible because they are not funded. The comment does not identify specific mitigation measures; therefore, specific responses cannot be provided. Project proponents and applicants would be responsible for funding mitigation measures associated specifically with project impacts.

Regarding the comment about hourly workers not being able to afford housing in the Sunset Area, the housing market is subject to the same forces of demand and supply as any other market. Demand for housing is determined by various factors, including housing prices, population (size of the market), household income, employment opportunities, transportation options and costs, interest rates, availability of credit, long-term economic outlook, and other factors. Housing supply is similarly impacted by a number of different factors, including housing cost, land value, landowner expectations and preferences, government regulations, availability of financing, and other factors. Market demand for housing 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. The project is envisioned to contain different housing options at various price points. These housing options include single-family homes of mixed densities, high-density multifamily homes, student housing, and subsidized affordable housing. This range of housing options is intended to accommodate a range of salary levels and meet market demand.

- 36-3 The comment expresses concern about the public outreach conducted for this project, requests that the County recirculate the Draft EIR with an analysis of the Citizen-Initiated Smart Growth Plan, and expresses concern about the County’s presentation at the public hearing that characterized the project’s significant and unavoidable impacts as being outside of the County’s jurisdiction and control. These issues are addressed below.

CEQA requires, and allows for, numerous opportunities for the public to provide comments throughout the environmental review process. These comments help to guide the development of alternatives and the environmental analysis. Such opportunities include the public scoping process which occurs when the notice of preparation is published, formal public comment period after the release of the draft environmental document, as well as public hearings. These public input processes are described in detail in Section 1.3, “Environmental Review Process,” of 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. 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.

As to the request that the County recirculate the Draft EIR with an analysis of the Citizen-Initiated Smart Growth Plan, 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 County's presentation at the public hearing that characterized the project's significant and unavoidable impacts as being outside of the County's jurisdiction and control, see Section 5.1, "Significant and Unavoidable Impacts," of the Draft EIR, which lists the project's significant and unavoidable impacts and also states,

It should be noted that many of these impacts are considered unavoidable only because they would occur outside of Placer County's jurisdiction and the County could not ensure the enforcement of the otherwise feasible mitigation measures identified in this EIR.

CEQA requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects (Public Resources Code [PRC] Section 21000 et seq.). CEQA also requires that each public agency avoid or mitigate to less-than-significant levels, wherever feasible, the significant adverse environmental effects of projects it approves or implements. If a project would result in significant and unavoidable environmental impacts (i.e., significant effects that cannot be feasibly mitigated to less-than-significant levels), the project can still be approved, but the lead agency's decisionmaker, in this case the Placer County Board of Supervisors, must prepare findings and issue a "statement of overriding considerations" explaining in writing the specific economic, social, or other considerations that they believe, based on substantial evidence, make those significant effects acceptable (PRC Section 21002; CCR Section 15093).

**From:** Cheryl Berkema <cheryl.berkema@gmail.com>  
**Sent:** Friday, February 22, 2019 4:58 PM  
**To:** Shirlee Herrington  
**Cc:** Cheryl Berkema  
**Subject:** Sunset Area Plan DEIR feedback

<b>Letter</b> <b>37</b>
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February 22, 2019

Placer County Planning Commission  
 3091 County Center Drive #140  
 Auburn, CA 95603  
 Subject: Sunset Area Plan DEIR Feedback  
 Attn: Shirlee Herrington, Environmental Coordinator ([sherring@placer.ca.gov](mailto:sherring@placer.ca.gov))

Placer County Planning,

In December 2018, several concerned citizens made public and written requests of Placer Planning that the many significant projects being introduced by Planning be rescheduled and staggered appropriately to allow adequate time for public review. Time extensions were also requested for the projects due to the excessive document sizes, which were far beyond CEQA guidelines for documents, many of these projects were thousands of pages in length. In addition, several major hearings were also scheduled within the same timeframe completely inundating the public. The Sunset Area Plan, the largest regional project known to Placer County was introduced during this onslaught of document dumping, again, completely overwhelming the public. The Sunset Area Plan is a project a decade in the making. The Sunset Area Plan document was so large that the County had to get a waiver from the State Clearinghouse to divide it into multiple pieces as there is a 300-page limit for documents. The Sunset DEIR was not posted on the Placer EIR website until late January. The Placer County website upgrade broke Sunset Area Document links the final week of public review. Additionally, The Sunset DEIR review period was also during a federal shutdown prohibiting inquiries on housing, transportation, federal environment issues, and for the Placer County Conservation Program.

CEQA's purpose is to (1) inform governmental decision-makers and the public about potentially significant environmental effects of proposed projects, (2) identify ways that environmental damage can be avoided or significantly reduced, (3) prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures, and (4) disclose to the public the reasons why a governmental agency approved the project if significant environmental effects are involved. Why is Placer Planning putting up roadblocks for residents to adequately review and provide informed comments on a project of such importance as CEQA requires?

The Sunset Industrial Area Plan previously proposed by Placer County a decade ago made great promises, however the project objectives were never realized. The Sunset Industrial Area Plan was shown to not be economically feasible. That huge associated project price tag to present the project was picked up by Placer County residents. Placer County is introducing a similar proposal and expecting different results. How and when do we expect repayment of the millions of dollars that the County has invested?

The Sunset Area Plan is a Hodge podge of disjoint components assembled together largely to create a tax revenue base for Placer County and to benefit wealthy developers (so far unnamed, apparently not willing to commit to the project). This lack of developer commitment puts the County at great risk. The Sunset Area Plan is reminiscent of the urban sprawl projects of the 20th century, not a forward-looking project that has citizen's and environmental needs of the 21st century at the forefront.

The Sunset Area Plan as proposed is deficient in the following areas:

- No developers have committed to the Sunset Area plan putting the county (and taxpayers) at significant risk. The County being the applicant and approver is a conflict of interest.
- The County has failed to show that the project is economically feasible, neither in the short term 20-year time frame nor in the longer 80 year projected project buildout.

37-1

37-2

- No innovators were mentioned in the DEIR. Stating you are creating an innovation center does not mean they will come. The lack of innovators in the EIR is a significant impact to the economic feasibility of the project. The expected revenue from the innovation area of the project should be detailed in the EIR. This is a risk to the project. A major benefit stated in the EIR is the ability for University students to intern with the innovation area of the project.
- No University has committed to the Sunset Area Plan. Conversely, universities have backed out of the plan, showing lack of participation and commitment to the project. As the University is described to play an important part of the project both in terms of importance to the community and for jobs it would create, this is a significant impact. The project should not be approved without a committed University. This presents significant risk to the project financials and does not meet the project objectives.
- Would destroy significant vernal pools, habitats, and endangered species. species that are "fully protected" under the Fish and Game Code cannot be taken and moved as part of a mitigation plan. *Center for Biological Diversity v. California Department of Fish and Wildlife (2015) 62 Cal.4th 204* .
- Will create a new affordable housing crisis. Hourly workers will not be able to afford housing in the Sunset area. Not only does this compound the housing crisis, it increases the vehicle miles traveled, as workers will need to travel to work in the Sunset Area.
- Will not create the jobs that are projected. The County has failed to show where these jobs are expected to come from.
- Will create close to a million daily vehicle trips a day. This also fails to meet project objectives.
- Is not energy efficient, will produce excessive greenhouse gas emissions, The Sunset Area Plan does not provide alternative sources of energy. GHG emissions create health hazards see *California Supreme Court in Sierra Club v. County of Fresno (S219783)*
- CEQA does not allow the promise of future action associated with mitigation measures that are currently not feasible because the Placer County Conservation Program (PCCP) has not been adopted. Current laws should be referenced as mitigation measures.
- A huge number of significant impact mitigations are not funded, so cannot be viewed as feasible nor valid. This needs to be addressed in the EIR
- The no build alternative was more impactful to the environment. This needs to be explained in the EIR in great detail.

37-2  
cont.

A project of this magnitude requires much more than a workshop, a public hearing and an article in the Sacramento Bee. Citizens should seriously question the urgency for pushing this project through and the lack of public outreach that the County has provided to the Sunset Area Plan. Placer County has already spent millions of tax payer dollars on implementing sections of the Sunset Area Plan- a plan that has not been approved or reviewed by the public. When and how will taxpayers be repaid for these expenses since the County is acting as applicant for the project. One of the main objectives of the DEIR is to provide permanent conservation for the environment and endangered species yet the project is destroying the farmlands, riparian areas, and vernal pools. The conservation for the proposed mitigation lasts for only 50 years. The calculations for why the County states they are meeting this goal needs to be revisited either removing the reason that the project is considered as meeting the objective or making the conservation permanent.

I request that you consider the process that has been used to deliver the Sunset Area Plan as insufficient and recirculate the Sunset Area Plan DEIR with the Citizens Initiated Smart Growth Plan as an alternative on the Draft EIR with the 2019 CEQA 120-day review period as a minimum to allow full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan. This Plan is environmentally superior to the proposed project and meets County objectives as set forth in the Draft EIR.

37-3

You the Placer County Planning Commissioners have the opportunity to create something special for Placer County. A world class master planner that has designed for some of the most innovative companies in the world has created a vision for an ecosystem that can resonate with citizens, be less impactful on the environment and set example for projects to follow. This is a gift to Placer County. I hope you recognize the opportunity.

Thank you for the opportunity to provide comments on the DEIR process.  
Sincerely,

Cheryl Berkema

**Letter** | Cheryl Berkema  
**37** | February 22, 2019

This comment letter is virtually the same as the content of comment letter 36. Therefore, the responses simply cross reference to responses to this letter.

37-1 See response to comment 36-1.

37-2 See response to comment 36-2.

37-3 See response to comment 36-3.

**From:** Larissa Berry <lzberry@peoplepc.com>  
**Sent:** Sunday, January 13, 2019 2:40 PM  
**To:** Shirlee Herrington; EJ Ivaldi; Christopher Schmidt; Crystal Jacobsen; Kally Kedinger-Cecil; Clayton Cook  
**Cc:** Ashley Brown; GBCA; defendgb@gmail.com; AEL-Leslie Warren  
**Subject:** Time extension request for upcoming DEIRs

**Letter**  
**38**

Good evening,

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.

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38-1

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,

Larissa Berry

**Letter** | Larissa Berry  
**38** | January 13, 2019

38-1 This comment letter is virtually the same as the content of comment letter 32. Therefore, this response simply cross-references to responses to this letter. See responses to comments 32-1 through 32-3.

**From:** Crystal Jacobsen  
**Sent:** Friday, February 01, 2019 8:08 AM  
**To:** Larissa Berry  
**Cc:** Shirlee Herrington  
**Subject:** RE: Prime farmland designation for SIA/PR project

**Letter**  
**39**

Hi Larissa,

Impacts related to farmlands is outlined in the Agricultural Resources Chapter which is section 4.2 of the DEIR. I hope that helps.

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](mailto:cjacobse@placer.ca.gov)

-----Original Message-----

From: Larissa Berry [<mailto:lzberry@peoplepc.com>]  
Sent: Thursday, January 31, 2019 5:31 PM  
To: Crystal Jacobsen <[C.Jacobse@placer.ca.gov](mailto:C.Jacobse@placer.ca.gov)>  
Subject: Prime farmland designation for SIA/PR project

Good morning Ms Jacobsen,

I have only begun delving into the massive EIR associated with the SIA/PR project. Could you please clarify or point me to the appropriate section within the DEIR as to the land description for the farmlands being absorbed by the project?

I am trying to determine if they are considered Class I or II soils mapped by the US Soils Conservation Department. If not, could you please provide the description of this particular acreage?

Thank you in advance  
Larissa Berry

Sent from my iPhone

39-1

**Letter** | Larissa Berry  
**39** | January 31, 2019

39-1 The comment asks where in the Draft EIR farmlands that would be affected by the project are described, including their soil classification. Section 4.2, "Agricultural Resources," of the Draft EIR addresses this issue. Specifically, pages 4.2-3 through 4.2-7 describe the soil capability classification of soils within the project site.

**From:** Larissa Berry <lzberry@peoplepc.com>  
**Sent:** Wednesday, February 13, 2019 9:01 PM  
**To:** Shirlee Herrington; Sue Colbert; Megan Wood  
**Cc:** Crystal Jacobsen; AEL-Leslie Warren; defendgb@gmail.com; GBCA  
**Subject:** Comments for Public Hearing on the Sunset Industrial Area Plan

<b>Letter</b> <b>40</b>
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Ms. Herrington,

Please forward my comments to the Planning Commission for consideration in the public hearing on the Sunset Industrial Area Plan.

Thank you  
Larissa Berry

Commissioners,

The Sunset Area Industrial Plan has been in the works for a number of years. Suddenly there seems to be an irrational need to rush through the DEIR review and public comment periods. This massive document in addition to multiple other documents of extraordinary length have been "dumped" on the public in a very short time frame producing an undue burden and violating the core of CEQA which mandates public input. The 2019 CEQA guidelines are for a review period of 120 days. Since there is yet no commitment from a University, the County has no time pressure and should extend the review period of a document that is too large to be downloaded as a single file.

Development of this nature should and must include those residents who will be forever impacted. The project was previously deemed economically infeasible. It appears that nothing has changed. No funds are available for mitigation of any of the 44 pages of Significant and Unavoidable Impacts. As such, we the residents of Placer County need to participate in and anticipate what *this alone* implies in fees, taxes, congestion, compromised public services such as emergency response, neglect of deteriorating infrastructure and roads that will be further stressed by a huge increase in numbers of homes and vehicles, availability and sourcing of water, etc.

The Alliance for Environmental Leadership is in the process of finalizing a "future forward plan" that is respectful of existing and new residents as well as the environment. I urge you to include their proposal as an alternative with less impact as required by CEQA and extend the review period to at minimum of 120 days. This County could lead the way in how development should be done - by doing it now.

}

40-1

Respectfully  
Larissa Berry

<b>Letter</b> <b>40</b>	Larissa Berry February 13, 2019
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40-1 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. See response to comment 32-1 regarding CEQA requirements for public review periods, CEQA page limit recommendations, and requests for extension of the comment period.

The comment also states that the 2019 CEQA Guidelines require a review period of 120 days. This is not correct. As described in response to comment 32-1, 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).

Regarding the comment that the project is not economically feasible and that funds are not available for mitigation of the project's significant and unavoidable impacts, a market study was prepared by EPS, which evaluated the economic viability of the PRSP and SAP. The market study did not conclude that the PRSP or SAP was economically unviable. Regarding mitigation funding, see Master Response 9: Mitigation and Development Fees.

As to the request that the County recirculate the Draft EIR with an analysis of 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.

February 21, 2019

Letter  
41

Placer County Planning Commissioner,

Please accept my comments as part of the administrative record for the Sunset Industrial Area Specific Plan. I will preface my comments by stating that the extent of the project and the massive quantity of information presented to the public have far exceeded CEQA guidelines of 100 pages for a small project to 300 pages for a complex project. The number of documents being ‘dumped’ on the public within a short period of time, all exceeding 1000 pages with appendices, is in direct contradiction to the purpose of CEQA which is to inform the public of significant impacts so that they may appropriately comment and participate in the development process.

41-1

The Specific Plan sets forth a plan for development of the Sunset Industrial Area which is located outside the borders of Lincoln, Roseville and Rocklin. The project will utilize major arterial corridors including Highway 65, 80 and State Route 99. Because of the proximity of the proposed development to these residential and commercial centers, I am concerned about the cumulative impacts the development will have upon these established areas. Of particular concern is the Project's resulting increases in vehicular use and traffic. The traffic issues have two components - (1) level of service impacts to specific roadway sections; and (2) increases in vehicle miles travelled and daily vehicle trip, which in turn have impacts on air and water quality from added vehicular trips and impervious surface. The DEIR has not adequately analyzed or identified mitigation measure for these impacts. In addition, the DEIR's inadequate analysis of greenhouse gas emissions cumulative with these other established centers is an issue of statewide importance.

The DEIR has failed to address the cumulative impacts and ability to meet project required Levels of Service cumulatively with areas which have been identified as having no funding to mitigate to a less than significant level. As such, with no funding in the foreseeable future to remedy the traffic issues, the analysis must include their traffic numbers along with the proposed traffic increases as a result of the SIA development. The DEIR did not consider the impacts associated with this increase in vehicular use in Lincoln, Roseville and Rocklin. Placer County should analyze these impacts to determine that they can be mitigated to a less than significant level. Traffic impacts do not stop at borders of jurisdiction and the roadblocks being created due to lack of available funding in these adjacent cities must be evaluated to determine that Traffic requirements can be met **within** the project.

41-2

The CEQA Guidelines are clear that "[t]he DEIR demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context." (Cal. Code Regs., tit. 14, § 15125(c).) Here, the DEIR does not include an analysis of the impacts that will be associated with the Project's increase in vehicular use within the adjacent areas and is, therefore, inadequate.

The project claims of generating adequate business draw and employment opportunities have been inadequately defined. Statements of fact need to be substantiated with evidence. Since a developer has not been identified, the Regional University Plan does not have signed a contract to maintain and operate an additional campus along with the withdrawal of Warwick, and lack of identity, the DEIR needs to address with quantifiable evidence that the project is economically feasible since it was previously rejected in the 2007-time frame by the City of Roseville. Assertions are speculative.

41-3

The DEIR fails to quantify within the Environmentally Superior Alternative section, ‘HOW’ the No-Project Alternative “**would result in a more severe significant biological impact associated with the loss of vernal pool habitat**”. Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to the region and would be affected by the project. The DEIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context. Loss of vernal pools, farmland, etc have not been adequately described or evaluated.

41-4

The DEIR does not address Affordable housing needs adequately and needs to further clarify affordable housing goals since California has deemed availability of affordable housing to be a Statewide priority. Further explanation of how this project will meet State targets needs to be expanded.

41-5

An alternative created by the residents of Placer County, the Citizen’s Initiated Smart Growth Plan (CISGP) should be included as a viable alternative since it achieves the same goals and objectives of the Sunset Area Industrial Specific plan with fewer impacts.

41-6

Respectfully  
Larissa Berry

<b>Letter 41</b>	Larissa Berry February 21, 2019
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41-1 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. See response to comment 32-1 regarding CEQA page limit recommendations.

41-2 The comment expresses concern regarding cumulative LOS impacts and increases in VMT. The comment asserts that the Draft EIR fails to consider cumulative traffic impacts resulting from vehicular travel in adjacent cities (Lincoln, Roseville, and Rocklin).

The Draft EIR addresses the project's impacts to traffic operations (i.e., level of service impacts to intersections and specific roadway segments) and overall vehicular use (i.e., vehicle miles traveled). This is also accounted for in the Draft EIR's air quality and greenhouse gas emissions analysis.

The Draft EIR discloses the project's cumulative traffic impacts, including the anticipated cumulative level of service, as described in Impacts 4.14-15 through 4.14-23. This includes reasonably foreseeable roadway projects that are anticipated to be completed based on the financially constrained SACOG 2036 MTP/SCS project list.

The Draft EIR cumulative traffic analysis includes trips generated by reasonably foreseeable development in Lincoln, Roseville, and Rocklin, as described on page 4.14-94. Furthermore, the traffic analysis considers the project's traffic impacts in these jurisdictions, as shown in Impacts 4.14-17 through 4.14-19. Exhibits 4.14-16, 4.14-19, and 4.14-22 show that the traffic analysis considers increases/changes in traffic volumes on roadways in Lincoln, Roseville, and Rocklin that result from the proposed project. Therefore, the analysis does address vehicular traffic changes in adjacent areas.

41-3 The comment states that the Draft EIR needs to address whether the project is feasible. The comment references the Regional University Plan. The Draft EIR was released for the SAP and PRSP, not the Regional University Plan. These are two separate projects. See responses to comments 56-6 and 56-9 regarding financial feasibility.

41-4 The comment states that the Draft EIR does not quantify how the No-Project Alternative would result in a more severe significant biological resources impact associated with loss of vernal pool habitat. This statement is excerpted from Section 6.5, "Environmentally Superior Alternative," of the Draft EIR. The complete analysis of the No-Project Alternative is provided on pages 6-10 through 6-14, with the analysis of biological resources provided on page 6-13. As described in Master Response 1: Alternatives Analysis, quantification of impacts is not required by CEQA for project alternatives. Rather, "the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison to the proposed project" (CEQA Guidelines Section 15126[d]). As to the comment about the regional setting being critical to the assessment of environmental impacts, see Section 4.4.2, "Environmental Setting," which describes the environmental setting for biological resources (including those resources that are rare or unique, as referenced in the comment). This environmental setting constitutes the baseline physical conditions by which the County determines whether an impact is significant, consistent with CEQA requirements. Mitigation is identified to reduce potentially significant and significant impacts. Where mitigation is unavailable or available but unable to reduce impacts to below the thresholds of significance, impacts are determined to be significant and unavoidable. Thus, contrary to the commenter's assertion, the project's significant impacts are adequately analyzed and discussed, and significant impacts are considered in the full environmental context. No evidence is provided to the contrary in this comment.

Finally, the comment states that loss of vernal pools, farmland, etc. are not adequately described or evaluated. These issues are addressed in Sections 4.4, “Biological Resources,” and 4.2, “Agricultural Resources,” of the Draft EIR. The comment does not provide specific reasons specifying why the Draft EIR is inadequate in these analyses. Therefore, a response is not warranted.

41-5 The comment claims the Draft EIR does not address affordable housing needs adequately, and requests further explanation as to how this project is consistent with State housing regulations. See response to comment 18-2. Additionally, see Section 4.12.2 of the Draft EIR for information regarding affordable housing needs and compliance with State housing law. State housing law requires counties to prepare a Housing Element as part of its General Plan to adequately plan to meet each jurisdiction’s housing needs, and Placer County complies with Sate housing regulations through the County’s Housing Element.

41-6 The comment requests that the County evaluate the CISGP as an alternative to the project. As noted in Master Response 2: Citizen-Initiated Smart Growth Plan, 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.

**From:** Kathleen Crawford <kathleen@thecrawfordfamily.net>  
**Sent:** Thursday, February 21, 2019 5:30 PM  
**To:** Shirlee Herrington  
**Subject:** Re: Sunset Area Plan/Placer Ranch Specific Plan DEIR Report - State Clearinghouse No. 2016112012, Vol. 1&2

**Letter  
42**

Dear Ms. Herrington,

AS a resident of Sun City Roseville, I have concerns about the incomplete DEIR on the Sunset Area Plan stated above. My particular concerns are in the areas of residential, transportation and environmental impacts. Living off Blue Oaks and Fiddymont and seeing the current developments being built out, this plan does not take into consideration how the proposed developments will exacerbate current growth problems.

42-1

Kathleen Crawford  
 4130 Sylvan Glen Lane  
 Roseville, CA 95747

**Letter  
42** | Kathleen Crawford  
 February 21, 2019

42-1 The comment expresses the opinion that the project does not consider how the proposed developments would exacerbate current growth problems. Potential impacts of the project related to growth are evaluated in Section 4.12, “Population, Employment, and Housing,” of the Draft EIR. Impact 4.12-1 evaluates the population growth from new homes and businesses associated with the project and determined that impacts would be significant, but noted that reducing development would conflict with Placer County’s objectives to provide opportunities for economic innovation, offer housing diversity, improve the jobs-housing balance, catalyze development, establish a major employment center, and other objectives (see Chapter 3, “Project Description,” Subsection 3.4.1, “Sunset Area Plan Objectives,” and Subsection 3.4.2, “Placer Ranch Specific Plan Objectives”). Impact 4.12-3 evaluated the growth impacts of the project in association with cumulative growth in the region and concluded that while buildout of the net SAP and PRSP areas would have a modest contribution to overall regional growth, the project would have a considerable contribution to this significant cumulative impact.

February 22, 2019  
To: Shirlee Herrington  
From: Charlene Daniels  
Subject: Sunset Area/Placer Ranch Specific Plan Draft EIR

Letter  
43

Thank you for the opportunity to comment on the Sunset Area/Placer Ranch Specific Plan Draft EIR. I have the following comments that primarily focus on the Placer Ranch EIR.

Land Use

- The EIR needs to provide a more thorough discussion and provide adequate documentation as to why the one mile buffer currently required by the PCGP needs to be reduced. It seems that if the County is already receiving numerous complaints about the landfill, it indicates that the current one mile buffer is not adequate. Although the analysis cites other agencies that have a buffer less than one mile, this seems immaterial when there is clearly a problem with the existing facility.
- If the EIR has already determined that there will be a substantial increase in the number of complaints about the landfill, the proposed change to reduce the land use buffer is inconsistent with PCGP policy 4.G.11, which requires the landfill be protected from incompatible encroachment. The EIR analysis does a good job in documenting this incompatibility by recognizing that complaints will increase as the specific plan develops. Is the County proposing to eliminate the requirement that the landfill be protected from incompatible development?
- The EIR has determined that reducing the land use buffer for the landfill will result in a Significant and Unavoidable impact. The analysis recognizes that the County will be receiving an increase in complaints as a result of sensitive land uses being located so close to the landfill. Will the developer provide mitigation funds to the County and the Air Pollution Control District to offset the increased costs associated with the increased number of complaints?
- The EIR also states that the County may have to alter the manner in which the landfill operates, will the Placer Ranch property owner be required to pay for any changes in how the landfill will operate in order to reduce nuisance complaints?

43-1

Population and Housing

- Housing Element policy B-6 “Affordable units need to be provided in a timely manner ....” needs to be added to the list of applicable general plan policies. The project descriptions need to explain in greater detail how this will be implemented.
- On page 4.12-12 of the EIR, it states that *the project is generally consistent with at the applicable General Plan policies as discussed, impacts related to General Plan consistency would be less than significant.* Additional discussion of the various housing element policies is needed in the EIR and the Specific Plan to verify that this statement such as:
  - Will each small lot tentative map be required to provide the 10% affordable housing requirement. If not, how will be obligation be redistributed to ensure that the specific plans will ultimately provide the 10% requirement?
  - The Placer Ranch Specific Plan states that in-lieu fees could be used to provide affordable housing. The Specific Plan/project description needs to recognize that the County has not adopted the nexus study which would allow for in-lieu fees to be collected. Most importantly, it is not known that if the County should decide to approve an in-lieu fee amount, will the in-lieu fee sufficient to cover the full cost of constructing the required housing?
  - If all or most of the affordable housing units are provided in the High Density Residential area, would this result in a concentration of units (housing policy B-4) and would it also locate the affordable units closer to the landfill than other residential units within the specific plan?
  - The Specific plan/project description needs to clarify that the 10% affordable housing requirement will not be used to provide housing for the college students (dormitories). If the project description increases the need for affordable housing by including student housing, it should not take away from the need for affordable housing that is already generated by the specific plan itself.

43-2

Placer ranch eir comments

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<b>Letter 43</b>	Charlene Daniels February 22, 2019
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- 43-1 The comment expresses concern about the project's land use impacts related to the project's proximity to the landfill. See Master Response 4: Odors for a discussion regarding consistency of the project with Placer County General Plan Policy 4.G.11 and economic impacts on PCAPCD. Physical constraints related to odors and issues related to meeting project objectives are described in Master Response 2: Citizen-Initiated Smart Growth Plan. The comment does not raise issues related to the adequacy of the Draft EIR's analysis or conclusions but raises issues regarding revising General Plan policy (the physical impacts of which are evaluated in the Draft EIR).

Regarding the comment's question as to what party will pay for changes in landfill operations in response to odor complaints, in accordance with State CEQA Guidelines Section 15126.2(a), "[a]n EIR shall identify and focus on the significant effects of the proposed project on the environment." Section 15358(b) notes that "[e]ffects analyzed under CEQA must be related to a physical change." The comment regarding financial responsibility for changes in landfill operations can be considered by decisionmakers, but such an impact is outside the scope of the EIR; therefore, no revisions have been made to the Draft EIR in response to this part of the comment.

- 43-2 The comment suggests that Housing Element policy B-6 be added to the Draft EIR list of applicable General Plan Policies. It requests additional discussion of County Housing Policies be added to the PRSP and EIR that describes the project's affordable housing obligation in greater detail. The comment also requests information as to the timing, location, distribution of affordable units, university housing, and whether the affordable units would be concentrated near the landfill. See responses to comments 18-3 and 18-4, which address these issues.

**From:** Kristen Farquhar <kristen.atis@yahoo.com>  
**Sent:** Thursday, February 21, 2019 12:22 PM  
**To:** Shirlee Harrington  
**Subject:** DEIR Sunset Area Industrial Project

<b>Letter</b> <b>44</b>
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Ms. Harrington  
 Environmental Coordinator  
 Placer County

The Draft EIR for the Sunset Industrial Area Project and the Placer Ranch Specific Plan revealed significant impacts to the environment that no amount of mitigation will make right.

I live in the Rocklin Unified District, Area 3, adjacent to Area 1, Roseville. I have witnessed first-hand bad policy in action in regards to land development, mis-management of natural resources, faulty mitigation and poor communication and representation for the environment and the people from City Council and other so-called responsible agencies. The design for I-80/SR-65 Expansion Project labeled "Phase 1" could have been better.

Please do not make the same mistakes. I implore you and the Board of Supervisors to *terminate the proposal by approving the "No Project" alternative and give us the time to make this right.*

Along with the Alliance for Environmental Leadership, I stand in support and respectfully request that 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.

Regards,  
 K. Farquhar  
 Rocklin, California

44-1

<b>Letter</b> <b>44</b>	Kristen Farquhar February 21, 2019
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44-1 The comment provides an opinion regarding the merits or qualities of the project; is also 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.

As to the request that the County evaluate the CISGP as an alternative to the project, 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.

**From:** Brett Hoffman <bhoffman07@mail.roosevelt.edu>  
**Sent:** Wednesday, February 20, 2019 9:12 AM  
**To:** Shirlee Herrington  
**Subject:** Sunset Industrial Area Project - Draft EIR

<b>Letter</b> <b>45</b>
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Hello,

My Name is Brett Hoffman. I currently work in Loomis and live in Rocklin. I am obtaining my MBA in Sustainability and working full time for a Water Environmental-Remediation company. I am very invested into sustainability efforts for Placer county current residents and those to come.

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.

Cordially,

Brett Hoffman  
 (916) 261 - 2136  
 4607 Lemon Hill Drive,  
 Rocklin, CA 95677

45-1

<b>Letter</b> <b>45</b>	Brett Hoffman February 20, 2019
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45-1 This comment letter is virtually the same as the content of comment letter 23. Therefore, this response simply cross-references to responses to this letter. See response to comment 23-1.

**From:** Carol Holliman <carolholliman@gmail.com>  
**Sent:** Friday, February 22, 2019 9:35 AM  
**To:** Placer County Environmental Coordination Services  
**Cc:** Shirlee Herrington  
**Subject:** Comments on Draft EIR for Sunset Area Plan/PRSP

<b>Letter</b> <b>46</b>
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**February 22, 2019**

Placer County Community Development Resource Agency,  
 Environmental Coordination Services  
 3091 County Center Drive #190  
 Auburn, CA 95603  
 Attn: Shirlee Herrington, Environmental Coordinator

Dear Ms. Herrington,

I am a resident of Placer County, living in Auburn. I have reviewed the County’s Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County:

The DEIR Section 2, Executive Summary, Table 2-1 lists all of the significant and unavoidable impacts under “Summary of Environmental Impacts and Recommended Mitigation Measures” with their corresponding DEIR reference number. I was very concerned to observe that there are sixty impacts listed as “Significant and Unavoidable” (SU) after mitigations. My first request is that the County fully consider the implications of each of these, rather than accept each SU conclusion and continue forward. None of the DEIR alternatives adequately address the majority of these SU impacts, so new, more effective alternatives should be sought, and the DEIR revised and re-circulated in light of superior alternatives.

46-1
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As a daily commuter to work in Sacramento along I-80, I am particularly alarmed by the potential impact to transportation and circulation. According to the DEIR Section 2, Executive Summary, Table 2-1, section 4.14, there are 25 listed impacts, 12 of which are Significant and Unavoidable (SU) after mitigation. There are numerous impacts which decrease the Level of Service (LOS) from an acceptable level to an unacceptable level LOS D or worse. One of the worst examples is that of the Woodcreek Oaks Boulevard / Painted Desert Drive intersection, which currently operates at LOS F during a.m. peak rush hour; it would experience an increase in delay of more than 200 seconds per vehicle (4.14-4). The Alliance for Environmental Leadership (AEL) estimates an increase in daily vehicle trips of 895,317 based on data provided in the January draft of the SAP [Consumer Initiated Smart Growth Plan, pgs 47,66-67], an incredible additional load on roads that are already struggling to handle the current VMT load. The many significant impacts to transportation and circulation described in the DEIR should be of major concern to the County and all residents the neighboring cities.

46-2
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In her presentation during the February 14<sup>th</sup>, 2019 public hearing on this DEIR, Crystal Jacobsen explained that many of the traffic-related SU’s were listed as SU because they were outside of the jurisdiction of the County. She also noted that the primary mitigation for these impacts was the use of a fair-use charge on developers to fund road improvements. I was under the impression that she was suggesting that the many SU’s were not as serious as it appeared for this reason. I respectfully disagree. Building permits would be issued when the fee is paid, even though in many cases no existing approved plan exists to address the additional road improvements required even if funding was available. It is not appropriate to approve a development plan, or the EIR that reports on it, based on vague future expectations. As my second request, I ask that you require effective, fully funded mitigation plans before considering approval of the EIR.

46-3
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As indicated above, the primary mitigation shown in the DEIR is that of charging the developer a fair-share impact fee to fund construction of transportation facilities and/or improvements in the affected area. The DEIR does not adequately address other measures that exist to reduce impact, and is thus not in compliance with CEQA. Other measures include the fully funded creation of light rail / Rapid Transit options, the construction of a transportation center, car sharing programs and more substantial plans for residential models where more residents live and work within a ¼ mile radius, with supporting services, such as shops, restaurants and hospitals. A much better alternative is extensively documented in the AEL's Citizen Initiated Smart Growth Plan (CISGP). My third request is that you also recirculate the DEIR after inclusion and evaluation of the CISGP alternative to allow full and thorough analysis. This Plan is environmentally superior to the proposed project and meets County objectives as set forth in the DEIR.

46-3  
cont.

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

Sincerely,

Carol Holliman  
5207 Morningside Ave,  
Auburn, CA 95602  
(530) 878-1427

<b>Letter 46</b>	Carol Holliman February 22, 2019
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46-1 The comment expresses concern regarding the project's significant and unavoidable impacts. See response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts. As described therein, CEQA specifically requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects (PRC Section 21000 et seq.). Thus, the commenter's request that the County fully consider the implications of each significant and unavoidable impact is an explicit part of the CEQA process and, therefore, the County's project approval process.

Regarding the statement that the Draft EIR alternatives do not adequately address the project's significant and unavoidable impacts, see Master Response 1: Alternatives Analysis. Also, see Master Response 2: Citizen-Initiated Smart Growth Plan.

46-2 The comment expresses concern regarding significant traffic impacts, particularly LOS impacts, identified in the Draft EIR, and specifically cites the Woodcreek Oaks Boulevard/Painted Desert Drive intersection as an example. The Draft EIR discloses the project's impacts to traffic operations and identifies feasible mitigation measures to reduce the severity of these impacts. The example of the Woodcreek Oaks Boulevard/Painted Desert Drive intersection is addressed on page 4.14-70. As noted in the Draft EIR, traffic operations at this intersection are restored to an acceptable LOS C or better with the recently installed traffic signal.

The comment incorrectly asserts that the project would result in an increase of 895,317 daily vehicle trips. The increase in daily vehicle trips cited in the comment is overstated. Table 4.14-35 on page 4.14-106 of the Draft EIR presents the daily trip generation at buildout of the SAP. This table shows that 561,635 daily trip ends are generated at buildout of the SAP. However, some of these trip ends would remain internal to the SAP area (i.e., begin and end within the SAP area). Therefore, the number of external trips would be less.

46-3 The comment requests fully funded mitigation plans be in place before considering approval of the EIR. Development within the net SAP and PRSP areas would be required to pay traffic fees for both regional roadway impacts as planned through various joint powers agencies and other groups the County participates in to mitigate impacts to off-site roadways that are outside the County's land use authority. Also, see Master Response 9: Mitigation and Development Fees.

**From:** Terry Holliman <terryholliman@gmail.com>  
**Sent:** Thursday, February 21, 2019 8:02 AM  
**To:** Placer County Environmental Coordination Services  
**Subject:** SAP/PRSP DEIR

<b>Letter</b> <b>47</b>
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February 20, 2019

**Placer County Community Development Resource Agency,  
 Environmental Coordination Service  
 3091 County Center Drive #190  
 Auburn, CA 95603  
 Attn: Shirlee Herrington, Environmental Coordinator  
 ([cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov))**

Dear Ms. Herrington

I have reviewed the County’s Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County:

My comments are focused on Section 4.16 of the DEIR, specifically 4.16.3 Regulatory Setting. It begins by listing some of the applicable State rules and regulations, including the following discussion of Title 24, Part 6.:

“California’s Building Energy Efficiency Standards CCR, Title 24, Part 6, is California’s Energy Efficiency Standards for Residential and Non-Residential Buildings. Title 24 Part 6 was established by CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California’s energy consumption and provide energy-efficiency standards for residential and nonresidential buildings. . . . In 2016, CEC updated Title 24 standards again, effective January 1, 2017. CEC estimates that the 2016 standards are 28 percent more efficient than 2013 standards for residential construction (CEC n.d.) and are approximately 5 percent more efficient for nonresidential construction (CEC 2015).

The 2019 Title 24 Part 6 Building Energy Efficiency Standards were adopted by the CEC on May 9, 2018 and will take effect on January 1, 2020. The standards are designed to move the State closer to its zero net energy goals for new residential development. It does so by requiring all new residences to install enough renewable energy to offset all the site electricity needs of each residential unit (CCR, Title 24, Part 6, Section 150.1(c)14). CEC estimates that the combination of mandatory on-site renewable energy and prescriptively required energy efficiency features will result in new residential construction that uses 53 percent less energy than the 2016 standards. Nonresidential buildings are anticipated to reduce energy consumption by 30 percent compared to the 2016 standards primarily through prescriptive requirements for high-efficacy lighting (CEC 2018). The building efficiency standards are enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary in response to local climatologic, geologic, or topographic conditions, provided that these standards are demonstrated to be cost effective and exceed the energy performance required by Title 24 Part 6.”

47-1

This section continues with:

“Housing Energy Conservation GOAL: To increase the efficiency of energy use in new and existing homes with a concurrent reduction in housing costs for Placer County residents.

- Policy G-1: The County shall require that all new dwelling units meet current State requirements for energy efficiency Retrofitting of existing units shall be encouraged.”

I would like to comment that the above underlined portion of Policy G-1 could be read to refer to the 2016 standard of Title 24, Part 6 since the 2019 version will not go into effect until January 1, 2020. This would subvert the gains in efficiency that new regulations require. Perhaps the sentence could be revised to state: “: The County shall require that all new buildings meet 2019 or later Title 24, Part 6 requirements for energy efficiency and encourage developers to exceed Title 24 requirements. It should be pointed out that it is unlikely that any building permit will be issued until the 2019 standard is in force.

In 4.16.4 Analysis, Impacts, and Mitigation the DEIR Building Energy Efficiency states: “STANDARDS OF SIGNIFICANCE Based on Appendix F (energy) of the State CEQA Guidelines, implementing the project would have a potentially significant impact on energy if it would:

- result in wasteful, ...;

- fail to incorporate feasible renewable energy or energy efficiency measures into building design, equipment uses, transportation, or other project features, or otherwise fail to increase reliance on renewable energy sources;”

47-2

By clearly requiring 2019 Title 24, Part 6 the County will minimize any controversy and improve the overall energy use by the project. This would be a very large mitigation in the modeling of energy usage and a positive for the DEIR.

Similarly, in the “PROPOSED SUNSET AREA PLAN GOALS, OBJECTIVES, AND POLICIES the SAP includes the following goals and policies related to energy consumption:”

“Housing Energy Conservation GOAL: To increase the efficiency of energy use in new and existing homes with a concurrent reduction in housing costs for Placer County residents.

- 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.”

47-3

This sentence should be revised as per the above discussion. In addition, the Policy G-1 should be continued to include a statement defining how the County will hire, and/or train, enough qualified and certified professional staff to evaluate the energy analysis, plans and documentations that are required by 2019 Title 24, Part 6. I do not believe that statements which include phrases like “the required actions (mitigations) will be implemented in the future” are acceptable as mitigation. Since the required implementation date is approximately ten months away the specific details should be available for inclusion.

Policy NR-6.7: Residential Energy Efficiency and section “IMPACTS AND MITIGATION MEASURES” should also be clarified to bring this section into agreement with 2019 Title 24, Part 6.

I would also like to echo the commentary of Pierre Delforge with the Natural Resources Defense Council in his blog of 12/5/18:

How would you like living in a home with a dramatically reduced electric bill? That will be a reality for most new homes in California starting in 2020, thanks to a new building energy code adopted today by the California Energy Commission. The updated code—the first of its kind in the nation—will combine rooftop solar panels with enough energy efficiency measures like insulation and better windows that all new single-family homes and low-rise apartments will use net-zero electricity. This means that their solar array should offset all electricity use for cooling, plug-in equipment, and lighting on an annual basis.

47-4

The groundbreaking decision to make these new homes net-zero electricity, coupled with major savings from more efficient lighting required by the updated code for commercial buildings, will save Californians more than \$1.7 billion in net energy savings over the next 30 years and reduce carbon pollution statewide by 1.4 million metric tons. This is equivalent to the emissions from the annual electricity use of all households in the city of San Francisco.

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

47-5

Sincerely,

Terence Holliman  
5207 Morningside Ave.  
Auburn, CA 95602  
530 -878-1427

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<b>Letter 47</b>	Terence Holliman February 20, 2019
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- 47-1 The comment addresses the possible interpretation of Policy G-1 of the Housing Element in the Placer County General Plan to suggest that all new buildings in the county would be built to the 2016 California Energy Code. Rather, the General Plan policy ensures compliance with the building standards in effect at the time of construction. All project buildings (and all new construction in the county) would be required to comply with the version of the California Energy Code in effect at time of construction, which could be the 2019 standards, or a later iteration. All development in the county is required to comply with the California Energy Code. No revisions are necessary to the Draft EIR.
- 47-2 The comment suggests that the 2019 Energy Code be required for the project. See response to comment 29-1.
- 47-3 The comment suggests that Policy G-1 be clarified. See response to comment 47-1. Regarding the issue raised number of County staff needed to enforce 2019 Title 24, Part 6, the County's staffing levels in response to the updates to the California Energy Code will not be affected by whether the proposed project is approved. Also, this is not an environmental issue and no further response is required.
- 47-4 The comment describes perceived benefits of the 2019 California Energy Code standards. No specific issues related to the content, analysis, or conclusions in the Draft EIR are raised in this comment. No further response is warranted.
- 47-5 The comment suggests that the County evaluate the CISGP as an alternative to the project. 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.

**From:** Glen Holstein <holstein@cal.net>  
**Sent:** Tuesday, February 12, 2019 1:25 PM  
**To:** Shirlee Herrington  
**Cc:** 'Leslie Warren'  
**Subject:** Spadefoots in Sunset Area Plan/Placer Ranch Specific Plan

<b>Letter 48</b>
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Dear Placer County,

It is come to my attention that no surveys for western spadefoots (*Spea hammondi*) have been done in the areas of the Sunset Area Plan/Placer Ranch Specific Plan because there are no records of this special status species there. I can confirm, however, that I found a population of this species in an ephemeral streambed there while conducting environmental surveys. Consequently focused surveys for this species should be done in these areas before any EIR can be considered complete.

My surveys also found approximately one thousand individuals of tricolored blackbird (*Agelaius tricolor*), another special status species, foraging in and around the landfill in the area of the plans.

48-1

Dr. Glen Holstein  
 Consulting Environmental Scientist

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This message has been scanned for viruses and dangerous content by [MailScanner](#), and is believed to be clean.

<b>Letter 48</b>	Dr. Glen Holstein, Consulting Environmental Scientist February 12, 2019
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48-1 The commenter states he personally identified a population of western spadefoot in an ephemeral streambed in the SAP area and approximately 1,000 tricolored blackbirds foraging around the landfill.

The Draft EIR acknowledges that western spadefoot may occur in the SAP area, analyzes potential impacts to this species (Impact 4.4-3), and proposes mitigation, including conducting surveys in suitable habitat, minimizing take (Mitigation Measure 4.4-3a), and compensation for habitat loss (Mitigation Measure 4.4-3b).

The Draft EIR acknowledges that tricolored blackbird may occur in the SAP area, analyzes potential impacts to this species (Impact 4.4-5, page 4.4-53), and proposes mitigation, including conducting surveys in suitable habitat, minimizing disturbance, and compensation for habitat loss (Mitigation Measure 4.4-5a).

**Chair and Members of the Placer County  
Planning Commission**  
3091 County Center Drive #140  
Auburn, CA 95603  
**Attn: Shirlee Herrington,**  
Environmental Coordinator

Arlene Jamar  
4645 Arrowhead Drive  
Rocklin, CA 95677  
February 21, 2019

Letter  
49

Ms. Herrington, Chairperson and Members of the Placer County Planning Commission,

I have reviewed the Placer County’s Draft Environmental Impact Report (DEIR) for the proposed Sunset Industrial Area Project and Placer Ranch Specific Plan. I have a few comments and concerns that must be addressed by the County.

The Draft EIR for the now-combined projects reveals significant impacts to the environment that cannot be mitigated. Because of the Projects’ egregious environmental impacts, the Board of Supervisors should terminate the project proposal by approving the “No Project” alternative. One omission that must be addressed in the DEIR is the process, and by whom, municipal services will be provided the area in collaboration with Roseville City. How will the necessary services and collaboration occur?

49-1

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.

In addition to my comments, the Alliance for Environmental Leadership group submitted Alternative 6 to the DEIR. This Alternative meets all of the County’s Objectives and would be environmentally superior to the proposed Project and the other Alternatives included in the DEIR.

I request that, as you recirculate the DEIR, AEL’s Citizen Initiated Smart Growth Plan be analyzed as a Project alternative.

49-2

Thank you for the opportunity to provide comments on the DEIR. I urge Commission members to thoroughly study and consider all communication relative to this DEIR. The impact of irresponsibly developing these 8,497 acres is huge and the results will be detrimental to all surrounding areas.

Sincerely,



Arlene Jamar

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<b>Letter</b> <b>49</b>	Arlene Jamar February 21, 2019
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- 49-1 The comment is directed toward the project approval process and does not raise issues related to the adequacy of 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 also asks about the process by which municipal services would be provided to the project in collaboration with the City of Roseville. Chapter 3, "Project Description," of the Draft EIR, describes the proposed utilities for the SAP on pages 3-26 and 3-27, and proposed utilities for the PRSP on pages 3-51 through 3-62 (other supporting infrastructure, including municipal services, located outside of the net SAP and PRSP areas are described in Section 3.6). Public utilities in the project area are provided by various entities, as identified in Table 4.15-1 and discussed in detail in Section 4.15, "Utilities," of the Draft EIR.

- 49-2 The comment requests that the County evaluate the CISGP as an alternative to the project. As noted in Master Response 2: Citizen-Initiated Smart Growth Plan, 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.

**From:** hollyjesq@aol.com  
**Sent:** Monday, January 14, 2019 11:09 AM  
**To:** Placer County Environmental Coordination Services  
**Cc:** Christopher Schmidt  
**Subject:** Re: Whitehawk I and II - Draft EIR - ADDITIONALLY Placer Retirement Residence Draft EIR and Cumulative Projects

<b>Letter</b> <b>50</b>
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Thank you.

It should also be noted that there are several draft EIRs that have been released recently by Placer County, whereby individually and cumulatively they are exceeding the page limitation and the burden placed on the public to adequately respond, which is not reasonable. Request is hereby made for the extension of time to respond to these projects and proposed revisions. My understanding is that the documents and projects proposed include, but are not limited to, Whitehawk I and II; Sunset Area Plan; Placer Retirement Residence draft EIR; Tiny Houses proposed amendments to the Placer County Code; Placer Ranch; Sunset Industrial Area/Placer Ranch draft EIR; and proposed Zoning Text Amendments to the Placer County Code.

Further, the Placer Retirement Residence draft EIR exceeds the page limitation set forth in regulation under CEQA. The offices associated with licensing and the facilities are closed due to the shutdown. Impacts for the Sunset Industrial Area/Placer Ranch project are far reaching and of significant impact on the entire county. The project will destroy thousands of acres of farmlands, wetlands, endangered species and add to traffic corridors with 10,000 additional homes without providing adequate affordable housing. Information from departments involved in affordable housing and destruction of endangered species are closed due to the federal government shutdown and, as a result, the public is denied access at this time to critical information that would allow pertinent statements.

It is respectfully submitted that there be an extension of time to respond to these projects. Please allow the public to adequately respond to the numerous projects and voluminous documents set forth by Placer County, and for the County to comply with federal and state mandates.

50-1

Thank you,  
Holly Johnson

-----Original Message-----

From: Placer County Environmental Coordination Services <[CDRAECS@placer.ca.gov](mailto:CDRAECS@placer.ca.gov)>  
To: Holly <[hollyjesq@aol.com](mailto:hollyjesq@aol.com)>  
Cc: Christopher Schmidt <[CRSchmid@placer.ca.gov](mailto:CRSchmid@placer.ca.gov)>  
Sent: Mon, Jan 14, 2019 10:24 am  
Subject: RE: Whitehawk I and II - Draft EIR

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 public 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

-----Original Message-----

From: Holly [mailto:[hollyjiesq@aol.com](mailto:hollyjiesq@aol.com)]  
Sent: Saturday, January 12, 2019 8:20 PM  
To: Placer County Environmental Coordination Services  
Cc: Christopher Schmidt  
Subject: Re: Whitehawk I and II - Draft EIR

Correction: Title 14 CCR reference should be to section 15141.

> On Jan 12, 2019, at 8:17 PM, Holly <[hollyjiesq@aol.com](mailto:hollyjiesq@aol.com)> wrote:

>

>

> To Whom It May Concern:

> Title 14 of the California Code of Regulations section 151410 provides that the draft EIR should be only 150 pages, with those of unusual scope to be less than 300 pages. The draft EIR for the Whitehawk proposals is 747 pages, plus the 1,638 pages in the appendices for a total of 2,385 pages. Placer County further released this EIR for public comment over the holidays, with no extension in the time period to respond.

> Placer County is in violation of the page requirements for the draft EIR pursuant to the California Code of Regulations. Request is hereby made to (1) ensure the Draft EIR complies with the page limitations; and (2) provide for further extension of time for the public to adequately respond.

> Furthermore, there is no adequate justification to approve the increase in density for these projects or to allow zoning modifications to authorize same. There is no adequate mitigation to the increase in traffic and congestion, and to already high level of services, or that which would adequately address the destruction in the nature and beauty of that area on Douglas Boulevard.

> Thank you in advance for your consideration.

> Holly Johnson

50-2

**Letter** | Holly Johnson  
**50** | January 12 and 14, 2019

50-1 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. See response to comment 11-1 regarding the government shutdown and the public’s ability to provide comments. See response to comment 32-1 regarding CEQA requirements for public review periods, CEQA page limit recommendations, and requests for extension of the comment period.

50-2 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. Nonetheless, see response to comment 32-1 regarding CEQA page limit recommendations and requests for extension of the comment period.

February 14, 2019

Letter  
51

Comments to the Placer County Planning Commission public hearing for the Draft Environmental Impact Report for the Sunset Area Plan and Placer Ranch Specific plan

Chair and Members of the  
Placer County Planning Commission  
3091 County Center Drive #140  
Auburn, CA 95603

Attn: Shirlee Herrington, Environmental Coordinator  
[sherring@placer.ca.gov](mailto:sherring@placer.ca.gov)

Dear Ms. Herrington and Chair and Members of the Placer County Planning Commission:

I have reviewed the County’s Draft Environmental Impact Report (DEIR) for the Proposed Sunset Area Plan and the Placer Ranch Specific Plan and I have questions, comments and concerns that I respectfully request be addressed by the County:

The table 2-1 of the Executive Summary lists 57 Significant but Unavoidable environmental impacts that would result from implementing the SAP. Some of these impacts are unavoidable because they occur outside the jurisdiction of Placer County, like the expansion of the Pleasant Grove Retention Facility in the City of Roseville. The environmental document for the expansion of this facility to accommodate the storm water from the SAP has not been created. Yet the SAP relies entirely on this expansion. I question whether it is even legal for Placer County to proceed with the SAP process under this tenuous situation. There is no guarantee that there will be anyplace for the storm water runoff from the SAP to go.

51-1

Section 3.4 of the Project Description contains the Goal and Objectives of both the SAP and the PRSP. But the SAP and PRSP are in conflict with these goals in many areas and my written comments will address a number of these conflicts but here are couple. One goal of the PRSP is to Foster Sustainable Community Design by aiding the County in achieving its objectives for long-term sustainability through project design and building practices that incorporate measures to reduce energy usage, conserve water, incorporate water efficient landscaping, treat storm-water, and reduce reliance on the automobile. However the project design does not meet these goals. The Citizen Initiated Smart Growth Plan which is being provided to you as an alternative to the SAP does go much further in every one of the above listed long-term sustainability goals. I think it would be prudent of you to recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership’s Citizen Initiated Smart Growth Plan. Another goal of the PRSP is to Enable Blueprint Consistency: Create a development plan that is consistent with the growth principles identified in the Sacramento Area Council of Government’s Blueprint, which consists of providing high-density residential neighborhoods; more compact forms of development; alternative transportation options, such as Bus Rapid Transit and bicycle use; and an interconnected network of residential neighborhoods, commercial nodes, and employment centers. The SAP and PRSP fail to meet the SACG blueprint and fails to provide Bus Rapid Transit compliant development. The CISGP does comply with the SACG blueprint and is Bus Rapid Transit compliant.

51-2

Scott Johnson 15215 Bancroft Road Auburn CA 95602 530-878-1566 [scottj@johnsonpianoservice.com](mailto:scottj@johnsonpianoservice.com)



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<b>Letter</b> <b>51</b>	Scott Johnson February 14, 2019
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- 51-1 The comment notes that implementing the project would result in significant and unavoidable impacts, some of which would be unavoidable because they would occur outside of the County's jurisdiction. These impacts are listed in Table 2-1 of the Executive Summary and in Section 5.1, "Significant and Unavoidable Impacts," the latter of which also includes the statement regarding jurisdiction. Also, see response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts.

The comment also suggests that the project is completely dependent on the Pleasant Grove Retention Facility. This is not correct. The Draft EIR states (page 3-26) that development in the SAP area would require stormwater volumetric retention as a means to minimize increased stormwater volumes that would otherwise reach the Sacramento River and that volumetric retention could be either on site or off site; however, off-site facilities on a regional scale would be more practical for the SAP, and several have already undergone some level of planning and design. Page 3-58 of the Draft EIR (as revised by this Final EIR; see Chapter 2, "Revisions to the Draft EIR") provides even further clarity indicating that retention is proposed to occur either on-site, in the existing City of Lincoln Lakeview Farms retention basin, or in a proposed retention basin that could be constructed on the Scilacci Farms property, for which the County has secured an easement, which allows for flood control. Therefore, several retention options are identified, including on-site retention. The project is not dependent on implementation of the Pleasant Grove Retention Facility.

- 51-2 The comment states that the SAP and PRSP conflict with the goals and objectives provided in the Draft EIR, including long-term sustainability and consistency with the Sacramento Area Council of Government's Blueprint. This is a summary of the detailed comments provided by the commenter in comment letter 52, below. See responses to the detailed comments in comment letter 52, below.

As to the request that the County evaluate the CISGP as an alternative to the project, 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.

Shirlee Herrington, Environmental Coordinator  
Placer County Community Development Resource Agency  
Environmental Coordination Services  
February 19, 2019  
Page 1

Letter  
52

Scott Johnson  
15215 Bancroft Road Auburn, CA 95602  
530-878-1566  
scottj@johnsonpianoservice.com

Via Email and U.S. Mail or hand delivery

Shirlee Herrington, Environmental Coordinator  
Placer County Community Development Resource Agency  
Environmental Coordination Services  
3091 County Center Drive, Suite 190  
Auburn, CA 95603  
[cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov)  
[sherring@placer.ca.gov](mailto:sherring@placer.ca.gov)

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

I have reviewed the County’s Draft Environmental Impact Report (DEIR) for the Proposed Sunset Area Plan and the Placer Ranch Specific Plan and I have questions, comments and concerns that I respectfully request be addressed by the County.

The County's Draft Environmental Analysis for the proposed Sunset Industrial Area found 57 significant and unavoidable impacts, many of which occur onsite, that could not be mitigated if the project were implemented. These will affect the health and well being of people and the environment today and impact future generations. Examples:

- Unavoidable impact: Green house gas emission exceeding 575,000 metric tons per year - a volume so great that it is projected to have global impacts
- Unavoidable impact: Loss and degradation of State and Federally protected waters
- Unavoidable impact: Increased automobile usage exceeding 870,000 daily vehicular trips that will result in declines of levels of service, roadway operations and intersection function on major regional roadways in the County and in the Cities of Roseville and Rocklin
- Unavoidable impact: increased stormwater runoff and increased potential for downstream flooding
- Unavoidable impact: Substantial soil erosion
- Unavoidable impact: Interfere substantially with wildlife movement and conflict with local policies and ordinances protecting biological resources
- Unavoidable impact: Create objectionable odors affecting a substantial number of people

52-1

Shirlee Herrington, Environmental Coordinator  
Placer County Community Development Resource Agency  
Environmental Coordination Services  
February 19, 2019  
Page 2

All of the above examples of impacts could be substantially mitigated by adoption of the Alliance for Environmental Leadership Citizen Initiated Smart Growth Plan as the environmentally superior alternative. Why should the County not recirculate the DEIR to allow a full and thorough analysis of the AEL's CISGP?

52-1  
cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**  
Impact 4.1-4: New source of substantial light or glare that would adversely affect day or nighttime views in the area after build out No mitigation is available. Significant and unavoidable Impacts

This impact is listed as “no mitigation is available.” I disagree with the DEIR assertion that no mitigation’s are available. I refer you to the work of the Dark Sky group and their recommendations for lighting when building new construction. The organization estimates that 30 percent of outdoor lighting in the U.S. is wasted, amounting to \$3.3 billion and 21 million tons of carbon dioxide emissions per year. Here is a link to an article with case studies.

<https://www.architecturalrecord.com/articles/11814-continuing-education-dark-sky-design>

Why would Placer County not use every available mitigation and the technologies and policies that are readily available to protect our views of the night sky? The DEIR consultant failed to analyze the importance of our night sky to wildlife (migration) and hunting. The consultant also failed to reference medical research about the important of our night skies to the health and well being of citizens (sleep and quality of life.) Nor did the consultant analyze how high quality views of the night sky will be an attraction for Placer County as a tourist destination and a place to relocate your home to, or locate new jobs and businesses. To what degree will the light pollution generated from the SPA and PRSP site impede enjoyment of the night sky, and why are available measures available to protect the night sky for wildlife and human and economic benefit not listed under mitigations? I believe this section is inadequate because the economic, wildlife and social values of the night sky were not quantified so that these “benefits” could be compared to any projected “costs” of mitigation.

52-2

Just because these guidelines have not been followed in surrounding communities is no excuse for building more structures with non-dark sky compliant outdoor lighting. In the future as buildings in surrounding communities have their outdoor lighting retrofitted with more energy efficient lighting, they should also be brought into dark sky compliance by county statute. What is light pollution? Mark Major, principal of London-based lighting design firm Speirs + Major, explains simply that since illumination is a byproduct of energy, if you are using more than is required, or you are putting it where it isn’t desired or necessary, “by definition, that is pollution.” The DEIR should quantify this pollution and the costs associated with it. Light trespass, the term for light cast where it is not wanted or needed, such as illumination from a streetlight cast into a bedroom, making it difficult to sleep is a form of light pollution which can cause harm but which can be mitigated by downward facing lighting.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**  
Impact 4.3-3: Long-term operational emissions of criteria air pollutants and ozone precursors Significant and unavoidable Impacts

The recommendations of the CISGP (Citizen Initiated Smart Growth Plan) for the Sunset Area would reduce the impacts of the long-term emissions. (See page 47, 64 & 65) The more compact development footprint and transit compatible planning of the CISGP will reduce car trips and encourage pedestrian and bike trips as well as (BRT) Bus Rapid Transit usage. (See page 122-125 of the CISGP) The CISGP

52-3

Shirlee Herrington, Environmental Coordinator  
Placer County Community Development Resource Agency  
Environmental Coordination Services  
February 19, 2019  
Page 3

replaces the 517 acre regional shopping center with an attraction center that is the same as in the SAP Entertainment and Mixed-Use District, but the Regional Shopping Center and Cornerstone District have been removed. By removing this component of the SAP, the CISGP maintains retail revenue for Lincoln, Roseville and Rocklin and will also reduce car trips. The inclusion in the Sunset Plan of a mall that is larger than the Galleria and Fountains and their surrounding retail areas combined is a holdover from earlier plans and is not relevant to the trends of today's shopping public which includes more online purchases and a preference for local business that keeps retail profits in local banks where it can be used to loan to other local businesses and homeowners instead of sending it to corporate headquarters in other states or countries.

52-3  
cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**  
Impact 4.3-6: Create objectionable odors affecting a substantial number of people. Significant and unavoidable Impacts. 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. Less than significant

The DEIR is wrong here in every way. It is simply willful ignorance for the DEIR to assert that. "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. However, these are unlikely scenarios. WPWMA and its member agencies have a substantial investment in the WRSL and MRF, which are benefits to the region; WPWMA is planning nearterm facility improvements; WPWMA remains actively engaged with the community and stakeholders about nuisance odor issues; and WPWMA continues to be proactive about implementing odor control measures, including pilot studies to investigate the feasibility of specific technologies. For these reasons, it would be speculative to conclude that public pressure would mount to such a degree to cause something as severe as diversion of waste to other facilities, landfill closure, or denial of expansion plans. Importantly, the results of research into similar facilities indicate that landfills that are the subject of odor complaints have been allowed to expand. For these reasons, this impact would be less than significant." On the contrary I think it is speculative on the part of the DEIR to conclude that public pressure would NOT mount to such a degree to cause something as severe as diversion of waste to other facilities, landfill closure or denial of expansion plans. The DEIR does not reference what research they are citing into similar facilities so we don't know if these are similar situations. The odor impacts will be even greater than expected because the SAP does not take into account the requirement to compost 100% of food waste beginning January 1, 2020 which the WRSL (Western Regional Sanitary Landfill) will need to be in compliance with. Once the WRSL comes into compliance the odor impact will be even greater. The recommendations of the CISGP (Citizen Initiated Smart Growth Plan) (see page 24) would reduce the odor impacts by maintaining the landfill buffer zone from the WRSL for residential units and schools. Placer Ranch seeks a variance to the buffer to put 5,827 homes, an elementary school, a middle school, and a university within the mile buffer. This reduction of the buffer zone is not mitigated by disclosure agreements during property sales as alleged by the SAP and PRSP and these disclosure agreements do not prevent class action law suits that could threaten the continued use of the landfill. Closure of the landfill would impact all the ratepayers of western Placer county negatively. Protection of the rail line into the SAP is important because the landfill will be closing in 40 years and all waste will need to be put on trains and

52-4

Shirlee Herrington, Environmental Coordinator  
Placer County Community Development Resource Agency  
Environmental Coordination Services  
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moved to Nevada. The WRSL has been looking at expansion for the past 4 years and will be starting to work on the environmental documents for this expansion in the next year. Changes to the buffer zone will jeopardize the ability of the WRSL to undergo this necessary expansion and this impact has not been addressed in the SAP and PRSP DEIR. The effects of odor from the landfill on humans has not been quantified or given adequate consideration. These effects can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache.) With the number of odor complaints already being filed with the county from outside the SAP and PRSP area (In January 2018, WPWMA received 109 odor complaints) it is irresponsible of the DEIR to propose a reduction in the buffer zone. The increase and subsequent drop off of odor complaints coincides with the increased awareness of WPWMA’s online odor reporting tool, and that odors potentially attributable to the WRSL were likely related to landfill gas (WPWMA 2018c). Odor notifications since that time have decreased, and WPWMA staff indicated they receive about two to five notifications per week. This slight decrease of complaints may be the result of weather patterns or resignation and frustration by those people affected rather than an actual reduction in odors.

52-4  
cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**  
Cumulative Impact 4.3-8: Long-term operational emissions of criteria air pollutants and precursors  
Significant and unavoidable Impacts

Placer County is a non-attainment area for criteria air pollutants and precursors. This document OPERATIONAL CRITERIA AIR POLLUTANT AND PRECURSOR EMISSIONS states that “If operational emissions will result in a significant impact, lead agencies shall implement all feasible mitigation to reduce the impact.” By saying that there is “No Mitigation Available” the SAP throws up its hands and admits defeat. On the other hand the CISGP (Citizen Initiated Smart Growth Plan) (see page 64 & 65) does reduce contributors to criteria air pollutants and precursors by reducing motor vehicle trips generated by the particular land uses (i.e., vehicles arriving and leaving the project site), including those by residents, shoppers, workers, and vendors.) The CISGP (see page 37) does this in part by replacement of the 517 acre regional shopping center with an attraction center that is the same as in the SAP Entertainment and Mixed-Use District, but the Regional Shopping Center and Cornerstone District have been removed. By removing this component of the SAP, the CISGP maintains retail revenue for Lincoln, Roseville and Rocklin. It will also reduce car trips thereby mitigating some of the long-term operational emissions of criteria air pollutants and precursors. The more compact development footprint and transit compatible planning of the CISGP will reduce car trips and encourage pedestrian and bike trips as well as meeting the needed density to be (BRT) Bus Rapid Transit compatible. Being BRT compatible (See page 122-125 of the CISGP) is important as the Capitol Corridor commuter train builds the third rail project (now funded) bringing 10 more commuter trains to Placer County per day. The BRT is needed to provide connections to these new trains. View the third main rail project plans here. See chart on page 10 [https://images.capitolcorridor.org/wp-content/uploads/2019/01/CCJPABizPlanFY1920\\_PublicDraft.pdf](https://images.capitolcorridor.org/wp-content/uploads/2019/01/CCJPABizPlanFY1920_PublicDraft.pdf)

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Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**  
Impact 4.4-1: Loss and degradation of state or federally protected waters Significant and unavoidable  
Impacts

The CISGP (Citizen Initiated Smart Growth Plan) embraces the wider setbacks from streams that are recommended by the Placer County Zoning Ordinance and those setbacks will reduce the degradation of state or federally protected waters from what they would be under the SAP. Changes in the land use planning of the CISGP (see page 31) will allow streams to meander as explained on pages 90, 91 & shown on page 121 of the CISGP. Protection of the Auburn Ravine watershed by increasing buffers on the SAP site is important in the ongoing efforts, in which I am personally involved, to restore and protect the endangered Central Valley Steelhead and the species of concern Fall Run Chinook Salmon that both populate Auburn Ravine. See pages 72 & 73 of the CISGP to quantify the Important Riparian Buffers acres protection provided in the CISGP vs. the SAP. Because of a long history of grazing on the SAP site there is a need for stream bank restoration. Trees and bushes need to be planted along these stream banks to stabilize them and restore damage done by grazing. The DEIR does not give adequate attention to this need for stream bank restoration.

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Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**  
Impact 4.4-3: Loss of federally listed vernal pool branchiopods and western spadefoot. Significant and unavoidable Impacts

The most significant ecological factor on site are the vernal pools. The Report of Science Advisers (County of Placer Natural Community Conservation Plan Habitat Conservation Plan, Report of the Science Advisers, Phase 1.” Burssard, P. et al. January 8, 2004.) states that, “In Placer County, urbanization, industrial development, and infrastructure construction have resulted in substantial losses of vernal pool ecosystems. The creation of new vernal pools in mitigation banks is of marginal long-term conservation value at best. Rather, effective conservation must focus on the protection of archipelagos of pools containing a number of pools and pool types plus a substantial portion of the surrounding catchment area.” See page 24 of the CISGP (Citizen Initiated Smart Growth Plan) for figures on the historical loss of vernal pools in Placer County. The SAP contains 17% of the remaining vernal pool habitat in Placer County and also the largest continual vernal pool complex. Conservation Management in the SAP referenced from the report of the Science Advisers cited above appear on page 114 of the CISGP and these conservation measures should be followed on the SAP. The SAP university land is donated by the developer and landowner of Placer Ranch, Eli Broad. The university site is a subdivision of a larger parcel with the an assessed market value of approximately \$20 million. All 300 acres are a vernal pool complex. Mitigated through the PCCP, the total land conversion and special habitat fees are upwards of \$40 million. By moving the university site to a different location within the SAP the CISGP (Citizen Initiated Smart Growth Plan) forestalls the impacts that the The Natural Resources Conservation Service identifies when it explains that all the main soil types have properties that severely limit their abilities to support buildings. Fiddymont soil is the most accommodating soil, providing only moderate limitations for shallow excavation. The limitations for the other types are either related to water or the shallowness of bedrock/cemented clay pan. These limitations for construction are the features that enable and sustain the vernal pool landscape. To prepare the soil for construction, it is likely that the soil will be scraped deeply and compacted with lime or other stabilizers to manufacture the desired structural properties. This will

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require specialty equipment. To eliminate complexity, entire parcels will be compacted and shaped by deeply cut roads, drains and overflow ponds. Such soil preparation is irreversible. The SAP does not do enough to fit new encroaching land uses around the vernal pool landscape but instead allows the superimposing of developer desired land uses onto the valuable and biodiverse vernal pool landscapes.

52-7  
cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**  
Impact 4.4-4: Loss of valley elderberry longhorn beetle Significant and unavoidable

I have observed that the planting of elderberry shrubs as mitigation for removal during construction on, for instance, the Winchester Estates property near my home, are subject to a very poor survival rate due to a lack of follow-up by the Placer County Community Development Department to ascertain if the mitigation has been effective. The elderberry is not only a host to the endangered valley elderberry longhorn beetle but is an important habitat developer, as the name implies. Elderberry also provides abundant food for native bird species. It is also a cultural artifact for the local Native American families who collect the stems for sacred musical instruments including flutes and percussion instruments. The berries are also collected as sacred medicine and eaten or processed into food. I question if the EIR consultant did an adequate biological survey to ascertain if elderberry exists on the site. I don't see where it is stated that this plant was found in the SAP or that any survey was ever conducted. In the PRSP area reconnaissance surveys were conducted in 2005 and 2017 that did not find elderberry. In section 4.4-4 of the Biological Resources section of the DEIR under Methods for Documenting Existing Biological Conditions, I see that no survey was done of biological resources in the SAP for the purpose of this DEIR. It is my belief that the document cannot be considered valid without a biological survey being done. Due to long time grazing of much of this site there is a need for stream bank restoration. Although I have observed mature elderberry bushes withstanding grazing for a few years, they are impacted, and because they are such an important species they should be part of any restoration program once grazing has stopped.

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Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**  
Impact 4.4-5: Disturbance or loss of special-status reptile, bird, mammal, and fish species Significant and unavoidable

The improvement of the CISGP (Citizen Initiated Smart Growth Plan) over the SAP in preserving riparian corridors and native grasslands will help preserve some of the species displaced by construction on the site. Preservation of native oaks and other measures found on page 100 of the GISGP should also be implemented as part of any plan for this area. Because no biological survey was done in preparation for the DEIR there may be a misplaced emphasis on preservation of native oaks. How many oaks to be preserved do occur on this portion of the western Placer prairie? We don't know because the DEIR does not contain that information. It should contain information on how many oaks are on the site and how many would be destroyed in order to implement the SAP and PRSP. So I strongly question if the DEIR is an adequate environmental document. The DEIR must tell you what you are losing and what the cost of mitigating that loss will be in order to make good land use choices in planning. Otherwise the plan is just letting land speculators drive development instead of following the goals and objectives of the plan area. Any urban or suburban development will change the mix of species that thrive in rural environments to a mix that is more compatible with the new land uses. This is why more compact development adjacent to larger open space areas is a better way to mitigate species loss than the suburban sprawl that the SAP and PRSP cause with their emphasis on single family homes built on former wet lands.

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Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

**Impact 4.4-6: Loss or degradation of riparian habitat Significant and unavoidable**

The SAP mitigation relies too heavily on payment of mitigation fees to a CDFW-approved mitigation bank or participation in the PCCP if it is approved. Some of these types of mitigation will be required, but by increasing the buffers to riparian habitat as the CISGP (Citizen Initiated Smart Growth Plan) does (see pages 72 & 73), more of the on-site riparian habitat can be preserved. Because of the exceptional high value riparian areas on the site, this increased buffering should be required. Changes in land use under the CISGP will also reduce loss and degradation of riparian habitats. This is especially true on the Placer Ranch property where, instead of single family housing and a University District as the SAP envisions, the CISGP calls for an Innovation Campus District wrapping around the The Urban Recreation network. (See page 31, 48 & 49 of CISGP.) Because of the history of grazing on the SAP it will be necessary to do planting of native shrubs and trees that were lost during the years of grazing. The DEIR fails to address this need and this failure will have a negative impact on riparian habitats.

52-10

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

**Impact 4.4-7: Conflict with local policies or ordinances protecting biological resources Significant and unavoidable impact**

The changes in land use planning for the SAP and PRSP mapped out in the CISGP (Citizen Initiated Smart Growth Plan) (see page 31) reduce the conflicts with local policies and damage to biological resources. The moving of the University off the Placer Ranch property and replacement of single family homes in the Placer Ranch area with the Innovation Campus District allows more flexibility in planning and minimizes the conflicts and damage. The Innovation Campus District wraps around the The Urban Recreation network which is the focal point and primary pedestrian thoroughfare providing opportunities for a spectrum of outdoor uses from urban lawn to riparian walks and programmable edges. It provides the ‘walk in the woods’ design requirement called for in modern planning. For instance rather than needing to mitigate tree loss with off site plantings because single family housing and the University district were superimposed onto sensitive biological resource areas of the Placer Ranch property, the CISGP allows for retention of more of those trees with the Innovation Campus District wrapping around the Urban Recreation network. (see page 48 & 49 of CISGP) Retention of mature trees along riparian corridors will also reduce special-status species loss. The mitigation measures proposed in the SAP only address tree loss instead of how to avoid tree loss with better land use planning. That said, the DEIR may be putting a misplaced emphasis on preservation of native oaks. How many oaks to be preserved do occur on this portion of the western Placer prairie? We don’t know because the DEIR does not contain that information. It should contain information on how many oaks are on the site and how many would be destroyed in order to implement the SAP and PRSP. So I strongly question if the DEIR is an adequate environmental document. The DEIR must tell you what you are losing and what the cost of mitigating that loss will be in order to make good land use choices in planning. Otherwise the plan is just letting land speculators drive development instead of following the goals and objectives of the plan area. There is no mention of how to mitigate for loss of special-status plants and animals, wetland and riparian habitats, vernal pool complexes, streams and stream zones, and large, un-fragmented areas of natural habitat, even though plan implementation would result in removal and/or degradation of these resources and would conflict with

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local ordinances and policies. The proposed mitigation measures are clearly inadequate. Section 3.4 of the Project Description contains the Goal and Objectives of both the SAP and the PRSP. But the SAP and PRSP are in conflict with these goals in many areas. One goal of the PRSP is to Foster Sustainable Community Design by aiding the County in achieving its objectives for long-term sustainability through project design and building practices that incorporate measures to reduce energy usage, conserve water, incorporate water efficient landscaping, treat storm-water, and reduce reliance on the automobile. However, the project design does not meet these goals. The Citizen Initiated Smart Growth Plan which is being provided to you as an alternative to the SAP does go much further in meeting every one of the above listed long-term sustainability goals. I think it would be prudent and I request that the county recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership’s Citizen Initiated Smart Growth Plan as the environmentally superior alternative. Another goal of the PRSP is to Enable Blueprint Consistency: Create a development plan that is consistent with the growth principles identified in the Sacramento Area Council of Government’s Blueprint, which consists of providing high-density residential neighborhoods; more compact forms of development; alternative transportation options, such as Bus Rapid Transit and bicycle use; and an interconnected network of residential neighborhoods, commercial nodes, and employment centers. The SAP and PRSP fail to meet the SACOG Blueprint and fails to provide Bus Rapid Transit compliant development. The CISGP does comply with the SACOG Blueprint and is Bus Rapid Transit compliant. Moving the senior housing closer to the urban core as the CISGP does will better meet the SACOG and DEIR objective of providing an interconnected network of residential neighborhoods, commercial nodes, and employment centers.

52-11  
cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**  
**Impact 4.4-8: Interfere substantially with wildlife movement Significant and unavoidable**

The California Essential Habitat Connectivity Maps on page 110 & 110 of the CISGP (Citizen Initiated Smart Growth Plan) shows the farmland to the west of the SA as a major migration corridor. Various fauna use this corridor to move between the grasslands and the high Sierras. At Roseville the habitat corridor is cut off. It may be surmised from the zoomed out map that it once connected with a corridor in Davis or a corridor southeast of Interstate 80. Pages 98,99 &100 of the CISGP address the changes that development of the SAP will make to Species Displacement & Migration along with some recommendations of how to best minimize these inevitable changes. Changes proposed to land use in the CISGP will help to preserve more of the food and shelter plants that support wildlife more effectively than the SAP zoning would have done. For this reason the County should recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership’s Citizen Initiated Smart Growth Plan as the environmentally superior alternative.

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Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**  
**4.7-2: Operational greenhouse gas emissions Significant and unavoidable impact**

In light of U.S. government and International scientific reports released in 2018 that give humankind 12 years to stop an irreversible catastrophic climate crisis caused by CO<sub>2</sub> and other GHG (Green House Gas) emissions, it is important that the CISGP (Citizen Initiated Smart Growth Plan) (see page 66, 67 & 69) does reduce the levels of GHG below the estimates for the SAP and PRSP found in the DEIR. The CISGP reduces GHG levels in 12 of 12 categories including Annual passenger vehicle emissions; Annual building energy emissions; Annual water-energy emissions; Annual passenger vehicle emissions per household; Annual building energy emissions per household; Annual water-energy emissions per household; Annual NO<sub>x</sub> emissions; Annual PM<sub>10</sub> emissions; Annual PM<sub>2.5</sub> emissions; Annual SO<sub>x</sub> emissions; Annual CO emissions; Annual ROG/VOC emissions, and reduces overall GHG emissions by 2139 million metric tons per year. The chart on page 69 of the CISGP show the comparison between carbon storage in the CISGP and the SAP both in the Net Change in Carbon Stock Measured and as Equivalent Passenger Vehicles Driven per Year. The SAP reduces the carbon stock by 8,605 million tons more than the CISGP reduces the same carbon stock. In terms of passenger vehicles driven per year the CISGP carbon retention equals a reduction of 6755 passenger vehicles driven per year compared to the SAP. Because of this, the county must recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan as the environmentally superior alternative. The DEIR uses an 80 year build out DEIR 3-27, but states that, "the amount of land development associated with the EMU district is speculative, given the absence of a specific project proposed in this district. However, local economic development representatives and land owners, and market factors suggest the SAP may be a potential location for a major destination entertainment or retail project." The DEIR does not provide any detailed information about who these economic development representatives and land owners are, or what they suggested exactly, or what the market factors are that are being used to indicate the SAP/PRSP areas as a location for a major destination entertainment or retail project. Without this information it is not just speculative but impossible to give credence to the acceptability of projections for land development associated with the EMU district. The county and the public cannot rely on the conclusions of the DEIR under such fluid conditions. The EMU district and the amount of development in this land use would be a major factor in determining GHG emission impacts and mitigation. The DEIR is not specific as to which impacts result from which of the 20 year phases and beyond that are being calculated for. This makes the DEIR useless for evaluating the impacts. The vague and fluctuating build out projections make the creation of an adequate DEIR impossible. At 4.12-10 the DEIR projects generation of 40,804 new jobs, but at 4.12-8 the DEIR says the area could support up to 15,300 jobs by 2035 and the number of jobs that could be supported according to the market analysis is lower than the number assumed at build out. What it does not say is which numbers of jobs the impacts and mitigation measures are based upon. This makes the DEIR useless for evaluation of the environmental impacts. The DEIR also does not explain how many of these jobs will be primary wage earner jobs, which is absolutely necessary to plan for housing if you intend to make a good faith effort to reduce VMT's and GHG emissions. Also at 4.12-11 the DEIR acknowledges that the build out of the SAP and PRSP areas will have significant unavoidable impacts on the environment, but there is no analysis of these impacts as is required by CEQA in any DEIR, and no proposed changes to the project to offset some or all of those impacts such as reducing the number of housing units or changing the housing mix, are discussed. The reliance on carbon offset programs to mitigate the 46,361,760,000 (46 billion) ton operational GHG emissions over the 80 year build out (4.7-21

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and appendix K) is not allowed under CEQA unless there is a functioning, enforceable, and effective implementation program. Where does the DEIR provide evidence that the offset program would be enforceable or effective? The fees for offsets are expensive and the DEIR does not take into account whether project proponents would be able to afford the fees. Fees currently run from 8 to 35 dollars per metric ton of CO<sub>2</sub>e. (DEIR at 4.7-21) Because this comes out to 1.6 billion dollars to offset 46 billion tons of GHG, and the DEIR does not explain how the project proponents will be able to afford this amount in offset fees, the DEIR fails to provide evidence that the offset fees are a feasible form of mitigation. Because of the cost and the requirements imposed by CAPCOA and CARB for the offset fees to be legal, and the lack of any explanation in the DEIR of how the requirements will be met or enforced, the proposal of carbon offset programs is not a feasible mitigation. The DEIR admits that the affordability and availability of GHG credits in the future is unknown. (4.7-23) The County cannot, as it does in the DEIR, conclude that the impact is significant and unavoidable and leave it at that. A more detailed analysis of how adverse the impact will be is required and the County must propose all feasible mitigation to substantially lessen the significant environmental effect. CEQA Guidelines 1509 (a)(1), 15126.2(b) (requiring an EIR to discuss “any significant impacts, including those which can be mitigated but not reduced to a level of insignificance”.) Other measures exist to reduce impacts. If they are not already part of the proposed requirements for development or proposed as mitigation, the County must consider and adopt the list below of feasible measures. If the County rejects any of these measures, it must support its decision with substantial evidence.

52-13  
 cont.

#### 1. Transportation and Motor Vehicles

- Create car sharing programs. Accommodations for such programs include providing parking spaces for the car share vehicles at convenient locations accessible by public transportation.
- Create local “light vehicle” networks, such as neighborhood electric vehicle (NEV) systems.
- Build or fund a transportation center where various public transportation modes intersect.
- Contribute funding to local and regional transit agencies.
- Provide public transit incentives such as free or low-cost monthly transit passes.

#### 2. Energy Efficiency

- Site buildings to take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use.
- Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings.
- Install light colored “cool” roofs, cool pavements, and strategically placed shade trees.
- Provide information on energy management services for large energy users.
- Install energy efficient heating and cooling systems, appliances and equipment, and control systems. ●
- Install light emitting diodes (LEDs) for traffic, street and other outdoor lighting.
- Limit the hours of operation of outdoor lighting.
- Provide education on energy efficiency.

#### 3. Renewable Energy

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- Install energy-efficient heating ventilation and air conditioning. Educate consumers about existing incentives.
- Use combined heat and power in appropriate applications.

4. Water Conservation and Efficiency

- Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls. ● Design buildings to be water-efficient. Install water-efficient fixtures and appliances.
- Restrict the use of water for cleaning outdoor surfaces and vehicles.
- Implement low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on-site can drastically reduce the need for energy-intensive imported water at the site.)

52-13  
cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

Impact 4.9-1: Increased stormwater runoff and potential for downstream flooding Significant and unavoidable

Table 2-1 of the Executive Summary mentions the Pleasant Grove Retention Facility (PGRF) 32 times in identifying the impacts of the project. Is it legal for this DEIR to rely on so many mitigation measures to be addressed by a project like the PGRF which has not yet gone through environmental review and has been identified as having itself many significant and unavoidable impacts? These impacts include : interfere substantially with native nursery sites (bat colonies), loss of trees protected under City ordinance, impacts on riparian habitat, possible impacts on special-status reptile, bird, and mammal species, impacts on valley elderberry longhorn beetle, vernal pool fairy shrimp, vernal pool tadpole shrimp and western spadefoot impacts, loss of vernal pool invertebrates, impacts on special-status plant species, loss of aquatic resources, loss of farmland converted to nonagricultural uses on the Pleasant Grove Retention Facility property. There seems to be some ambiguity in the DEIR regarding the loss of cultural sites caused by construction of the PGRF. Under Impact 4.5-2: Change in the significance of a unique archaeological resource, mitigation measures are outlined for the four archaeological sites and two multicomponent sites known within the Net SAP area, but the following statement occurs: “however, the Pleasant Grove Retention Facility and a portion of the Off-Site Transportation and Utility Improvements would not be subject to these policies. This impact would be potentially significant.” Is this because the mitigation of impacts on these cultural sites would be the responsibility of the City of Roseville? Again I wonder, is it legal for Placer County to pursue a strategy basing mitigation measures for the SAP on a project, the PGRF, that has not yet fulfilled the requirements of approval? Impact 4.9-1: Increased stormwater runoff and potential for downstream flooding. Under this impact the DEIR states that, “the City of Roseville or a City of Roseville / Placer County JPA would be the project proponent and CEQA lead agency for implementation of the Pleasant Grove Retention Facility. Because the County could not enforce implementation of this off-site retention project, this impact would be significant.” Can the impacts of storm water run off from the SAP at build out be mitigated without the PGRF? On page 23 of the DEIR section Sunset Area – Storm Drainage Technical Report it reads, “ The specific location for retention has not yet been determined, however, regional retention facilities within the Natomas Cross Canal watershed are planned to be utilized. The City of Roseville’s Reasons Farms (now called the Pleasant Grove Retention Facility) regional retention basin is currently being analyzed for proposed offsite retention in the Pleasant Grove Creek Watershed and two alternative regional locations are being proposed in the Auburn

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Ravine Watershed. Should the Sunset Area develop prior to regional facilities becoming available, interim retention facilities will be utilized.” The DEIR does not provide any detail about where, or about the cost of these interim retention facilities. This is a major inadequacy of the DEIR. These two alternative locations are not identified in the DEIR, but Lakeview Farms in the City of Lincoln in the Coon Creek watershed some miles away is addressed in the Sunset Area – Storm Drainage Technical Report section of the SAP DEIR. The transportation of storm water to the Lakeview Farms site would require installing storm drains under the Auburn Ravine in areas where endangered Central Valley Steelhead and threatened fall run Chinook Salmon spawn. Storm drains under creeks eventually become exposed creating barriers to fish passage. It is not adequate for the DEIR to take the opinion that because an impact like creation of a barrier to fish passage takes place off site that the project has not responsibility for that impact. If the storm-water from the SAP is in the pipe that is causing the blocked fish passage, it is clearly an impact caused by development on the SAP. At the planning commission hearing for the DEIR on February 14, 2019, lead planner Crystal Jacobson said that on site storm-water storage was being considered. I don’t find any mention in the DEIR of interim on site storm-water retention. If the County is using this as a backup plan it should be addressed in the DEIR. The DEIR for the Pleasant Grove Retention Facility states that the cost of building the facility is \$20,350,000 to 28,125,000 in 2002 dollars, not including any enhanced restoration planting or recreation trails. That cost in today’s dollars is now 40% higher. This cost estimate is for the initial facility, not including the expansion to accommodate the SAP and PRSP. The environmental document for the expansion has not yet begun to be developed. The SAP and PRSP DEIR does not address how this money will be raised, but relies on the project being built to accommodate the storm-water run off from the project. I question if it is even legal for Placer County to proceed with the SAP process under this tenuous situation. There is no guarantee that there will be anyplace for the storm-water runoff from the SAP to go. When I asked Crystal about the cost of the PGRF expansion to accommodate storm-water from the SAP and PRSP, she said the details on how the money will be raised is the responsibility of the City of Roseville where the site is located. So I conclude that is the opinion of the DEIR. Why can the DEIR rely on the PGRF expansion without any attention to how it will be funded?

52-14  
cont.

**Quoting the table 2-1 of the Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

Impact 4.9-4: Water quality impacts from urban land uses Significant and unavoidable

This impact description states, “projects within the project area would be required to comply with CVRWQCB, Placer County, and proposed SAP regulations, and permit conditions and would implement LID measures and stormwater BMPs to prevent urban pollutants from being carried into surface waters” However again there is no mention under the proposed mitigation measures of the Pleasant Grove Retention Facility PGRF. Is it possible for the project to meet the storm water regulations designed to prevent water quality impacts without the PGRF?

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**Quoting the table 2-1 of the Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

Impact 4.9-5: Development within 100-year floodplains Less than significant

The mitigation measures for this impact call for “finished building pad elevations to be a minimum of 2 feet above the 100-year floodplain line (or finished floor 3 feet above the 100-year floodplain line.)” What

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I do not see any references to how long the 100 year floodplain map will remain reliable in light of the changes in spring run off due to warming spring weather and stronger storms as a result of the climate change we are now experiencing. The 5 hottest years on record have occurred during the past 5 years according to a NASA. “the past five years become the five warmest since reliable measurements began more than a century and a half ago. Gavin Schmidt, director of NASA’s Goddard Institute for Space Studies, says it’s part of a trend that’s poised to see the planet become much hotter.

**Gavin Schmidt:** “What kind of planet is a planet that’s 4 or 5 degrees warmer than it is now? Well, we haven’t seen that on Earth since about 3 million years ago in the Pliocene. At that point, we had forests all the way up to the Arctic Circle, there wasn’t any ice, there was no Greenland, and sea level was about 25 meters higher. Right? That was a very different planet, and that’s kind of where we’re headed, unless we do something about emissions.” Wednesday’s (2-6-2019) climate report came as two House committees held simultaneous hearings to discuss the climate crisis. They were the first such meetings on Capitol Hill in six years. What mitigation measures have been modified by the DEIR consultant to take into account changes that are currently taking place in our climate?

52-16  
cont.

**Quoting the table 2-1 of the Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

**Impact 4.14-10: Impacts to freeway operations Significant and unavoidable**

The SAP falsely asserts that it is mitigating this impact by requiring or providing incentives to build housing in the SAP that will comply with Bus Rapid Transit compatible design. Page 52 of the CISGP provides the Exclusive Comparison: Accessibility - Walk Report. This shows that with the CISGP 100% of residents are living in minimum required density of 9 du/ac to support Bus Rapid Transit as outlined in the SACOG Blueprint and the Conceptual Bus Rapid Transit (BRT) plan for South Placer County, (see sections 3 and 4) as opposed to the SAP where only 12% of residents live within the required density of 9du/ac. In the CISGP 45% of Non-Residential Uses comply with the minimum FAR (floor area ratio) of 1.0 required to support Bus Rapid Transit as opposed to 0% in the SAP. For the Work Commute under the CISGP 100% of Residents live within 15 minute walking distance of a job site. Under the SAP this figure is only 9%. Under the CISGP 61% of of Job sites are within 15 minute walking distance for a residence while under the SAP this number is only 38%.The SAP fails to provide the required density of development to be Bus Rapid Transit compatible according to the SACOG blueprint. The CISGP does comply with the SACOG blueprint and is Bus Rapid Transit compliant, and so the county should recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership’s Citizen Initiated Smart Growth Plan as the environmentally superior alternative.

52-17

**Quoting the table 2-1 of the Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**

**Impact 4.12-1: Population growth from new homes and businesses Significant and unavoidable**

The DEIR lists no mitigation for this impact but admits that “the physical effects resulting from this level of population and employment growth (e.g., traffic generation, air pollutant and GHG emissions, noise, demand for services, construction of utilities and infrastructure) would be substantial. This impact would be significant.” But if the County recirculates the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership’s Citizen Initiated Smart Growth Plan as the environmentally superior alternative, and the CISGP is adopted as the preferred plan, there will be significant reductions in the impacts from population growth from new homes and businesses. On page 46 of the CISGP the Exclusive Comparison evaluates at the zoning level only, excluding CISGP reduction measures such as

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public transit and walking trails that would reduce impacts further. Because of this it is a fair comparison with the SAP and also represents a worst case scenario. The SAP numbers are the combined totals from the December 2018 SAP Draft and December 2018 PR Draft. In the category of GHG Emissions Per Household by Source, metric tons / household / year, the CISGP reduces emissions below combined SAP and PRSP levels by 79% for annual passenger vehicle emissions per household (and this is without public transit). Emissions for annual building energy emissions per household are reduced under the CISGP by 39% and Annual water-energy emissions per household are reduced under the CISGP by 66% from the SAP PRSP levels. Page 52 of the CISGP provides the Exclusive Comparison: Accessibility - Walk Report. This shows that with the CISGP 100% of residents are living in minimum required density of 9 du/ac to support Bus Rapid Transit as outlined in the SAGOG Blueprint and the Conceptual Bus Rapid Transit (BRT) plan for South Placer County, (see sections 3 and 4) as opposed to the SAP where only 12% of residents live within the required density of 9du/ac. In the CISGP 45% of Non-Residential Uses comply with the minimum FAR (floor area ratio) of 1.0 required to support Bus Rapid Transit as opposed to 0% in the SAP. For the Work Commute under the CISGP 100% of residents live within 15 minute walking distance of a job site. Under the SAP this figure is only 9%. Under the CISGP 61% of of job sites are within 15 minute walking distance for a residence while under the SAP this number is only 38%.

52-18  
cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**  
Impact 4.14-2: Impacts to intersection operations in Placer County Less than significant

I disagree with the claim of a less than significant impact. The DEIR bases this assertion on fair share fees offsetting impacts, but those fees come available for use long after the impacts are already being felt, so the impacts will be significant. If the County recirculates the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership’s Citizen Initiated Smart Growth Plan as the environmentally superior alternative, these impacts will be reduced substantially because the CISGP reduces VMT (vehicle mile trips) as shown on page 64 of the CISGP. The Comparison in Context: Transportation Report shows the reduction under the CISGP from the SAP in Average Annual VMT per Household is 1475.55 in billions of miles per year. Rather than relying only on fair share fees to offset impacts, the DEIR should be looking at an environmentally superior alternative that will reduce the impacts on intersection operations through reduction of total vehicle mile trips.

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Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**  
Impact 4.14-3: Impacts to signalized intersection operations in the City of Roseville Significant and unavoidable and Impact 4.14-4: Impacts to unsignalized intersection operations in the City of Roseville Significant and unavoidable Impact 4.14-5: Impacts to intersection operations in the City of Rocklin Significant and unavoidable Impact 4.14-6: Impacts to intersection operations in the City of Lincoln Significant and unavoidable Impact 4.14-9: Impacts to intersection operations under Caltrans jurisdiction Significant and unavoidable Impact 4.14-12: Impacts to vehicle miles traveled Significant and unavoidable

52-20

If the county recirculates the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership’s Citizen Initiated Smart Growth Plan as the environmentally superior alternative, these impacts will be reduced substantially because the CISGP reduces VMT (vehicle mile trips) as shown on page 64 of the CISGP. The Comparison in Context: Transportation Report shows the reduction under the CISGP from the SAP in Average Annual VMT per Household is 1475.55 in billions of miles per year. Rather than relying only on fair share fees to offset impacts, the DEIR should be looking at an environmentally superior alternative that will reduce the impacts on intersection operations through reduction of total vehicle mile trips.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**  
4.14-10: Impacts to freeway operations Significant and unavoidable Impact

52-21

It should be noted in the DEIR that the funding to make the necessary improvements to Hwy 65 and Hwy 80 in order to compensate for the impacts of increased VMT resulting from the projected build out of the SAP and PRSP areas has not been identified as of yet.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**  
Impact 4.15-10: Consistency with applicable general plan policies Less than significant

52-22

I contest the DEIR statement that the SAP and PRSP are consistent with the Placer County General Plan. Under the housing element of the PCGP the projected housing needs for various categories of housing types are listed on page 49. The mix of housing listed here does not dovetail with the housing mix for the SAP and PRSP. The proposed land use map does not integrate workforce and affordable housing in with other types of housing as required by the PCGP but locate it clustered up against the Placer Parkway and inside the smell zone of the sanitary landfill. University housing should not be counted in the 10% affordable housing requirement, and this stipulation should be stated in the DEIR. The CISGP states as a goal under Housing Choice Support: “Provision of attractive and under represented housing types locally to accommodate employees of Sunset Area businesses and make a synergistic atmosphere. Integrate housing into mixed use areas to prevent housing islands.” It accomplishes this goal by reducing single family large lot sprawl and encouraging mixed use urban core housing. In so doing the CISGP is more in line with the goals of the PCGP and the DEIR is out of sync with the PCGP goals. Another stated goal of the CISGP missing from the DEIR is Regional Housing Balance: “Balance the scale of Placer’s affordable and achievable housing options so the ratios better reflect Placer County residents. Incorporate equity by design to make desirable living places for all income levels.” The Exclusive Comparison: Summary Stats Report on page 50 of the CISGP compares the housing mix between the SAP and the CISGP. The CISGP provides a superior housing mix for the future workforce in the south Placer area while also reducing the

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negative environmental impacts that are in conflict with the PCGP. For these reasons the County should recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership’s Citizen Initiated Smart Growth Plan as the environmentally superior alternative.

52-22  
cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**  
Impact 4.3-2: Construction emissions of criteria air pollutants and ozone precursors Significant and unavoidable

The DEIR lists a litany of mitigation that is required of developers to reduce impacts to a less than significant level. Who will enforce these mitigation measures, which are very detailed? Will the existing County staff be responsible for this oversight? I have seen mitigation measures go unenforced in other projects due to lack of oversight by Placer County, oversight that should have been done to enforce compliance.

Will the County employ biologists, hydrologists, cultural anthropologists and other trained scientists to ensure that mitigation measures are implemented and monitored in perpetuity? How much time will be required to monitor all these mitigation measures and at what cost? If the County proposes to allow developers to enforce County mandated mitigation measures, please describe how this work will be monitored by the County and what mechanism is in place to monitor for mitigation performance and to remedy false or failed mitigation. This enforcement should not be citizen complaint driven. I had to personally document grading violations at the Winchester Estates development and provide that documentation to the County before fines were imposed and an end was put to the violations. That should not be the way enforcement works. The fines are not sufficient in some instances to provide any deterrent whatsoever.

52-23

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**  
Impact 4.2-1: Conversion of Farmland to a nonagricultural use Significant and unavoidable

The DEIR acknowledges that the Project could result in the total conversion of up to 7,295 acres of Farmland. The DEIR includes a mitigation measure calling for farmland to be preserved at a 1:1 ratio.. However, the measure is incomplete, inadequate and unenforceable. Consequently, the DEIR lacks any evidence to support that the mitigation measure will effectively reduce farmland-related impacts. The measure relies on the Placer County Conservation Plan (PCCP) “at such time as it is adopted.” The DEIR never explains how the eventual preparation of the PCCP will result in the preservation of Farmland. The mitigation measure relies on a “series of farmland preservation management plans” that will accompany each proposed development project in the SAP and PRSP, but the DEIR fails to describe these plans or explain how their preparation would reduce impacts and loss of farmland. The DEIR says that no additional mitigation would be required “as long as a substantial portion (as determined by the planning director in consultation with the County agricultural commissioner) of the mitigation lands acquired is undeveloped.” The DEIR never defines the term “substantial portion.” This seems to not be consistent with the mitigation goal of preserving farmland at a ratio of 1:1. What is the economic value of the ecosystem services that these lands provide? Nowhere in the DEIR are these services valued, and only if they are valued can the County make a rational decision regarding whether economic benefit associated with implementation of the SAP and PRSP exceeds the economic value of the ecosystem services provided by the agricultural lands (including agricultural economic production value, as well as carbon sequestration, oxygen, habitat etc.) The DEIR states in mitigation measure 4.2.1b that farmland preserved for the

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purposes of habitat mitigation may be counted toward Farmland mitigation. I take exception to this. Farmland mitigation and habitat mitigation are mutually exclusive. Land used for farming is generally not habitat. Farms can be managed in such a way that migrating birds can use it in the fallow season, for instance in flooded rice fields, but farmland does NOT provide the same habitat for non-migratory animals that non farmland provides, so the last sentence of Section 4.2 should be amended or removed.

In addition to the comments made above, I request the County also recirculate the DEIR to allow full and thorough analysis of the Alliance for Environmental Leadership’s Citizen Initiated Smart Growth Plan. The CISGP is environmentally superior to the proposed project and meets County objectives as set forth in the DEIR. CEQA Guidelines describe the circumstances that require re-circulation of a draft EIR. Such circumstances include: (1) the addition of significant new information to the EIR after public notice is given of the availability of the DEIR but before certification, or (2) the draft EIR is so “fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.” CEQA Guidelines § 15088.5. The DEIR fails to accurately estimate the environmental impacts and asserts that mitigation measures that are not feasible will mitigate impacts. The project description contains so many variables that it becomes impossible for anyone to make an accurate assessment of the environmental impacts. County will need to prepare a revised EIR that includes substantial new information.

52-24  
cont.

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

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52-1 The comment provides some examples of the project’s significant and unavoidable impacts. These impacts are also listed in Table 2-1 of the Executive Summary and in Section 5.1, “Significant and Unavoidable Impacts,” of the Draft EIR. Also, see response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts.

Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, 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.

52-2 The comment states that the Draft EIR does not analyze or provide mitigation for impacts to wildlife or human health and wellbeing resulting from light pollution. Although the EIR states that no mitigation is available to reduce Impact 4.1-4, it should be noted that various lighting reduction measures would be required through existing and proposed policies. On page 4.1-24, the Draft EIR states:

Parking lots and other similar areas may have tall light standards for safety and security. Placer County General Plan Policy 1.0.9 discourages the use of outdoor lighting that shines unnecessarily onto adjacent properties or into the night sky. Proposed SAP Policy LU/ED-3.9 requires adherence to several lighting design principles, including designing lighting to minimize projection into adjacent properties and onto adjacent roads, and capping the size of light standards to 18 feet. The SAP Corridor Design Standards and Guidelines require all lighting to be Dark Sky compliant and for lighting to minimize glare. A PRSP Development Standard and Design Guidelines requirement is that lighting for hardscape elements and signage should not create upward glare visible to drivers or from adjacent land uses. These measures would help limit brightness and amount of light associated with the project development.

Nighttime lighting reduction would be implemented due to compliance with SAP policy, and no additional mitigation measures are necessary. Although the commenter refers the County to the “Dark Sky group” and an article with case studies, the commenter does not identify, and the County is not aware of, additional measures that would be feasible and would further reduce impacts of the potentially significant nighttime lighting impact. In addition, as previously noted, lighting must be Dark Sky compliant. Therefore, the Draft EIR has not been revised in response to this portion of the comment, and Impact 4.1-4 remains significant and unavoidable.

The commenter asks why the County would not use available mitigation and technologies and policies to protect views of the night sky. On page 4.2-16, the Draft EIR explains that there are no additional feasible measures beyond the required policies and design measures that would reduce impacts to less than significant:

Although lighting would be minimized to the extent possible as a result of existing and proposed General Plan policies, including the directional requirements, capping of light standards, and minimizing spillover, the sheer quantity of lighting would create a new source of light pollution related to the substantial source of light across the project area. As a result, nighttime lighting impacts would be potentially significant. No feasible mitigation, beyond the policies and design measures, would be available to prevent the cumulative effect of light across the entire project area. Therefore, the impact related to nighttime lighting would be **significant and unavoidable**.

As explained, several approaches are integrated into existing and planned policies, standards, and guidelines. Furthermore, CEQA’s mandate to reduce impacts is that an EIR shall describe feasible, fully enforceable measures that could minimize significant impacts (State CEQA Guidelines Section 15126.4[a]). The commenter has not provided other measures that may be feasible for the County’s consideration; therefore, no revisions have been made to the Draft EIR in response to this portion of the comment.

In terms of lighting impacts on quality of life, the commenter does not cite a specific study or make specific claims about effects on sleep and quality of life. Therefore, only a general response can be provided to the commenter’s assertion that the EIR does not reference medical research related to night skies and health and well-being. The County recognizes there is research that may indicate that artificial light and light pollution can have an adverse impact on health (see, for example, Chepesiuk 2009, Kraus 2016). However, State CEQA Guidelines Section 15145 indicates that a lead agency need not evaluate an impact that would be too speculative. Analyzing the impacts of nighttime lighting in the project area on the health of those nearby would be speculative for several reasons.

First, people generally sleep inside at night and have control over light pollution entering their sleeping quarters. For example, light pollution can be controlled in residences and hotels with curtains and sleep masks. Additionally, the County cannot determine what people will do to control light pollution; therefore, it would be speculative to determine how many people would block outdoor lighting from entering their sleeping quarters and how many would not. This information would, however, be necessary to determine the level of effect. Furthermore, so many other variables, such as noise and individual health, affect sleep quality. Finally, it cannot currently be known where specific light sources would be in the project area in relation to sleeping quarters, as no specific developments are proposed at this time. Therefore, it would be speculative to determine the ultimate health effects of project nighttime lighting.

The commenter notes that the EIR does not discuss light pollution impacts that can best be characterized as economic and social effects (e.g., enjoyment of the night sky as a tourist attraction and as an attraction of new jobs to the area). State CEQA Guidelines Section 15131 states that “[e]conomic or social information *may* be included in an EIR” (emphasis added) and that the “focus of the analysis shall be on the physical changes.” Therefore, CEQA does not require analysis of economic and social effects, and, if provided, the evaluation should focus on physical changes. The commenter has not identified, and the County is not aware of, physical impacts associated with the importance of the night sky to tourism in Placer County or the importance of night sky views to home, job, and business relocation to the County. The EIR evaluates impacts of the project on the environment, and the possibility of people traveling and moving to Placer County due to night sky views is not an impact of the proposed project on the environment. Therefore, no changes to the Draft EIR have been made in response to the comment.

In the final paragraph of this commenter, it appears the commenter suggests that the County will allow structures that are not Dark Sky compliant because those guidelines have not been followed in adjacent communities. Regardless of what guidelines are followed in other communities and contrary to the commenter’s suggestion, development within the project area would be required to follow certain Dark Sky measures, as previously described. Furthermore, the commenter’s suggestion that buildings in surrounding communities be brought into Dark Sky compliance is not relevant to the proposed project, as the proposed project does not involve activities outside of the defined project area.

The commenter suggests the Draft EIR should quantify light pollution and costs associated with it; however, such an exercise would be infeasible, and, insofar as the commenter is referring to monetary costs, such an analysis is not required by CEQA. Light pollution is measured through aerial imagery; this measurement is of existing light pollution and is not a model of future light pollution. The County is unaware of a widely accepted practice for modeling future or planned light pollution levels. If there is an accepted methodology, modeling light pollution from the proposed project would nevertheless be infeasible because the ultimate building lighting configurations and locations cannot be known at this time because no development is being proposed. As a result, it would not be possible to come up with a reasonably foreseeable lighting scenario to model. Furthermore, the analysis in the Draft EIR is adequate as written, and the conclusion that lighting impacts would be significant and unavoidable is adequately supported.

Also, see response to comment 71-4.

- 52-3 The comment states that the CISGP would reduce long-term operational emissions of criteria air pollutants and ozone precursors over the project. See Master Response 2: Citizen-Initiated Smart Growth Plan, which explains that the CISGP would likely result in greater levels of air pollutant emissions than the proposed project.

The comment suggests that removal of the Regional Shopping Center and Cornerstone District proposed in the CISGP would reduce vehicular trips; however, this is not substantiated in the CISGP nor in this comment. It should be noted that a “regional shopping center” would be allowed but is not

specifically identified as a land use in the SAP. The Draft EIR's traffic analysis conservatively uses regional shopping center in the EMU to evaluate trip generation and estimate VMT, but that does not mean that a regional shopping center would develop in this location. Replacing the "regional shopping center" with a less vehicle-intensive use in the analysis would likely reduce traffic, VMT, and GHG estimates/impacts, but would yield less conservative results. Therefore, the Draft EIR's analysis is appropriate.

The comment asserts that the project would include a shopping mall that is larger than several nearby shopping malls including the Galleria and Fountains in Roseville. As mentioned above and described on page 1-5 of the Draft SAP, the EMU designation could include a wide variety of uses, including entertainment venues, theme parks, super-regional destination retail, shopping, restaurants, recreational facilities, hotels, health care-related services, residential, and utility and safety facilities. Because there are a variety of uses allowed in this land use designation, and specific developments are not yet known, it cannot be assumed that the project would include a shopping mall larger than nearby retail.

The comment also addresses local retail profits. This is not an environmental issue that is evaluated under CEQA. The comment does not address the content, analysis, or conclusions of the Draft EIR. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding project approval.

- 52-4 The commenter's disagreement with the analysis in the Draft EIR is noted; the County believes the Draft EIR accurately reflects impacts that would occur under the proposed project and reflects the requirements for analysis under CEQA.

See Master Response 4: Odors for a discussion of the Draft EIR's evaluation of odor impacts, including which impacts are appropriately treated as speculative in the Draft EIR. Although food waste diversion is expected to increase over time, resulting in greater composting activities, the Draft EIR addresses impacts against an appropriate baseline. As explained on Draft EIR page 4-3, "the baseline conditions for this Draft EIR are generally the conditions that existed in the SAP area in 2016," consistent with State CEQA Guidelines Section 15125(a). The Draft EIR explains that "[t]his setting generally serves as the baseline against which environmental impacts are evaluated." Therefore, the EIR properly analyses impacts associated with the landfill against existing conditions rather than conditions in the future

See Master Response 4 regarding potential future expansion of the WRSL. See Master Response 2: Citizen-Initiated Smart Growth Plan regarding impacts of the CISGP.

- 52-5 The comment suggests that mitigation has not been applied to address the project's long-term operational air pollutant and precursor emission impact. The comment points to the cumulative impact, Impact 4.3-8 as offering no available mitigation. However, Impact 4.3-3 of the Draft EIR includes Mitigation Measures 4.3-3a, 4.3-3b, 4.3-3c, and 4.3-3d which all reduce the project's operational air pollutant emissions. While the mitigation measures do not reduce the project's level of emissions to less than significant, it provides numerous feasible measures to reduce emissions. Beyond the mitigation measures included in Impact 4.3-3, there are no other mitigation measures that could be applied that would be cumulatively beneficial. Thus, the significance conclusion remains significant and unavoidable.

The comment suggests that vehicular trips and associated mobile-source emissions would be reduced under the CISGP in comparison to the proposed project. See Master Response 2: Citizen-Initiated Smart Growth Plan.

The comment also discusses the potential reduction to vehicular trips by removing the Regional Shopping Center and Cornerstone District. See response to comment 52-3.

The comment suggests that BRT is needed to serve the project area, particularly because there have been recent investments in transit lines, such as the Capitol Corridor train, that would bring more commuters to Placer County. The planning and implementation of BRT is not done at a plan-level scale because there would not be connections outside the project area that would serve BRT.

52-6 The comment states the CISGP would reduce impacts on federally protected waters compared to the SAP. See Master Response 2: Citizen-Initiated Smart Growth Plan. The comment states the Draft EIR does not give adequate attention to the need to restore and protect streambanks for the benefit of Central Valley steelhead and fall run chinook salmon in Auburn Ravine. The Draft EIR is not required to address impacts on Central Valley steelhead that are not related to the project. As noted on page 4.4-52, indirect effects of project implementation on special-status fish habitat outside the project area would be less than significant with compliance with CVRWQCB, Placer County, and proposed SAP regulations and permit conditions, and implementation of LID measures and stormwater BMPs to protect downstream water quality and fish habitat. Therefore, additional measures to reduce the impact even further are not required.

52-7 The comment states that it is necessary to preserve archipelagos of vernal pools; however, this term “archipelagos of vernal pools” does not have an ecological definition. The SAP Preserve/Mitigation Reserve land use designation comprises approximately 2,300 acres in the northern portion of the SAP area that contains the largest contiguous patches of high-density vernal pool complexes in the SAP area. It includes approximately 1,800 acres that are already preserved as permanent open space in four existing reserves. These preserve/mitigation reserve areas (see Exhibit 3-5, “SAP Land Use Diagram”) create large, interconnected preserves that would continue to provide habitat value to vernal pool species after the SAP is built out.

The comment also states that moving the university to a different location in the SAP area would forestall impacts from building on soil types that have properties that severely limit their ability to support buildings and require specialty equipment and soil preparation that is irreversible. Soil stability is addressed in the Draft EIR in Section 4.6, “Geology and Soils.” In this section, the Draft EIR discloses that expansive soils occur within the net SAP area and the PRSP area. The Draft EIR identifies mitigation measures requiring submittal of geotechnical reports, which would identify specific recommendations for the design of structures and facilities to avoid adverse effects associated with these soils. The mitigation measures also require implementation of the recommendations identified in the geotechnical reports.

The comment also states the SAP does not do enough to fit land uses around the vernal pool landscape and instead allows the developer to put desired land uses onto valuable and diverse vernal pool landscapes. Nearly the entire SAP area, including the PRSP area, supports vernal pool complexes so moving the university to a different area within the SAP area would not eliminate impacts on vernal pool resources. The area identified for the university is within an area that supports low density vernal pool complexes (<1-percent density of vernal pool type wetlands). Therefore, moving the university to another undeveloped location would produce similar or greater losses of vernal pool habitat. Urban development within vernal pool complexes constitutes a permanent and irreversible loss of habitat no matter which soil type underlies the development.

See Master Response 2: Citizen-Initiated Smart Growth Plan. As discussed in the master response, the County finds that locating the university site in an area that has substantial existing development, as proposed in the CISGP, would be infeasible.

52-8 The comment states that planting elderberry shrubs for mitigation is not effective because of low survival rates and questions if adequate surveys were conducted to ascertain presence of elderberry shrubs. The project is not responsible for restoring elderberry shrubs that may have existed in the SAP historically but were removed as a result of past grazing practices. The Draft EIR acknowledges that elderberry shrubs may be present in the net SAP or the PRSP area and other supporting infrastructure sites (see Impact 4.4-4). As noted on page 4.4-49 of the Draft EIR, no elderberry

shrubs were found in the PRSP area during protocol-level elderberry surveys conducted in 2005 or during the reconnaissance-level survey conducted in 2017, but elderberry shrubs may have established within the riverine/riparian complex in the PRSP area in the intervening years since the surveys were completed. Considering the 80-plus-year planning horizon of the SAP, it is appropriate to delay protocol-level surveys for elderberry shrubs to the period right before individual development projects are implemented because the abundance, size, and distribution of elderberry shrubs change over time. Access has not been granted to do protocol-level surveys on the net SAP area and biological resources impacts are analyzed at a program level of detail for the net SAP area. The proposed mitigation measures (Mitigation Measure 4.4-4a) for impacts on elderberry shrubs, should any be found during future project surveys, are consistent with the U.S. Fish and Wildlife Service's requirements for protection of valley elderberry longhorn beetle. Compensation for loss of elderberry shrubs may include purchasing credits at a USFWS-approved conservation bank, providing on-site mitigation, or establishing and protecting habitat for valley elderberry longhorn beetle as directed by USFWS consistent with their 2017 Framework.

- 52-9 The comment states that the CISGP would do a better job of preserving species displaced by construction because it preserves more riparian corridors and native grasslands. There are no native grasslands in the SAP area except possibly within the existing and planned reserves in the northern portion of the SAP area. Therefore, the CISGP does not preserve any additional native grasslands compared to SAP. As noted on page 4.4-64 of the Draft EIR, the majority of riparian habitat within the net SAP area is along Orchard Creek in the designated Preserve/Mitigation Reserve land use. There is very little (8 acres) riparian vegetation in the PRSP area. Valley foothill riparian habitat is restricted to the tributary to Pleasant Grove Creek in the southeast portion of the PRSP area. As noted on page 4.4-64 of the Draft EIR, the PRSP has been designed to avoid removal of riparian habitat through preservation of riverine/riparian complexes within designated open space preserve areas consistent with SAP policies. Therefore, the CISGP does not preserve any additional riparian habitat compared to SAP. Also see Master Response 2: Citizen-Initiated Smart Growth Plan regarding the differences between the proposed project and the CISGP, as well as the similarities between Alternative 4 (included in the Draft EIR's alternatives analysis) and the CISGP in terms of biological resource avoidance.

The comment states the Draft EIR provides an inadequate analysis of loss of native oaks. There are few native oak trees in the project area, and they are primarily located within the riparian/riverine complex areas that are planned to be retained within the open space land use designation. Sixty-three native oak trees were identified in the PRSP area during an arborist survey conducted in 2006. While some of these may have died since then and new saplings may have established, the numbers of native oak trees are unlikely to have changed substantially. The PRSP area remains relatively treeless with the exception of the riparian/riverine complex areas that are planned to be retained within the open space land use designation. Trees are relatively scarce in the net SAP area, and a large percentage of those present are ornamental trees associated with the existing rural residences and commercial developments (page 4.4-66). Most of the native trees present in the net SAP area are along Orchard Creek within the proposed Preserve/Mitigation Reserve land use designation (already an existing preserve) so they would not be removed. Mitigation Measure 4.4-7 on pages 4.4-67 and 68 of the Draft EIR describes exactly how loss of native trees would be mitigated (avoided or compensated) consistent with Placer County Code.

- 52-10 The comment states that the SAP mitigation relies too heavily on payment of mitigation fees and increasing riparian buffer widths consistent with the CISGP on-site would preserve more of the exceptionally high-value riparian habitat in the SAP and reduce loss and degradation, especially in the University District. There is no riparian vegetation in the University District Land Use designation. See Exhibit 4.4-2, "Land Cover," for distribution of the Riverine/Riparian Complex, which is the land cover category that encompasses riparian habitat. The University District land use designation includes seasonal swales and intermittent stream channels that support a few scattered cottonwood trees and not "exceptionally high-value riparian habitat." The intermittent streams are already

substantially degraded and incised, and the project is not responsible for restoring riparian vegetation that may have existed in the SAP area historically but was removed as a result of past grazing or other land use practices.

See also Master Response 2: Citizen-Initiated Smart Growth Plan, which explains that although the CISGP proposes wider Riverine/Riparian Complex setbacks, it would still result in a linear preserve network surrounded by urban development. This means that, similar to the project, riparian habitat value in these areas would be diminished for most species, and riparian habitat would be subject to the same types of indirect impacts from intrusion by humans and domestic pets, increased noise and light pollution, dumping or accumulation of litter and debris that is harmful to wildlife, and alteration of hydrologic regime (e.g., transition from seasonal to perennial inundation). Also see responses to comment 52-9 regarding riparian habitat in the SAP area.

- 52-11 The comment states that the CISGP allows greater retention so there would be less mitigation needed for tree loss and again states that the Draft EIR does not disclose the number of oak trees that exist and how many would be destroyed. See Master Response 2: Citizen-Initiated Smart Growth Plan regarding the level of impact reduction achieved by the CISGP and the feasibility issues associated with the CISGP. See response to comment 52-9 regarding oak trees.

The comment further states there is no mention of how to mitigate loss of special-status plants and animals, wetland and riparian habitats, vernal pool complexes, streams and stream zones, and large, unfragmented natural habitat areas.

Impacts to special-status plants are reduced through implementation of Policy NR 2-1: Special-status Plant Species Protection and Program NR-5: Special-status Plant Species Protection Guidelines, which are described on pages 4.4-32 and 33 of the Draft EIR. As stated on page 4.4-43 of the Draft EIR, implementing SAP Policy NR 2-1 and Program NR-5 would reduce impacts on known and potentially-occurring special-status plant species within the project area and off-site improvement areas within the County's jurisdiction because project proponents would be required to identify and avoid special-status plant populations to the extent feasible, and provide compensation for the unavoidable loss of special-status plants through establishment of new populations, conservation easements, or other appropriate measures. Also see response to comment 14-1.

Impacts to wetland and riparian habitats and stream zones are mitigated through implementation of Policies NR-2.4: Stream Habitat Mitigation, NR-2.5: Setback Area Protection and Maintenance, NR-3.1: Sensitive Habitat Buffers, NR-3.3: Stream Corridor Encroachment, NR-3.4: Stream Corridor Natural Conditions, NR-3.5: Stream Protection Best Management Practices and Low Impact Development, Mitigation Measure 4.4-1a Compensate for loss of aquatic resources and Mitigation Measure 4.4-6a: Avoid, minimize, or compensate for loss of riparian habitat. These measures as well as Mitigation Measure 4.4-3b would mitigate impacts to vernal pool complexes; however, the impact would remain significant and unavoidable because there are currently no mitigation banks that service western Placer County with credits available to fully cover the loss of habitat resulting from project implementation, as noted on page 4.4-48 of the Draft EIR.

As noted on page 4.4-41 of the Draft EIR, successful implementation of the SAP policies and Mitigation Measures 4.4-1 a and 4.4-1b is expected to reduce significant impacts on wetlands and other waters of the United States, and waters of the state, but not necessarily to a less-than-significant level. While these measures would result in "no net loss" of overall wetland acreage, there may not be enough credits available on the market to fully offset the loss of wetland functions resulting from project implementation, and it is unknown if sufficient land would be available from willing sellers to fully mitigate the loss. Therefore, this impact would remain significant and unavoidable.

Master Response 2: Citizen-Initiated Smart Growth Plan addresses comments related to SACOG Blueprint consistency, as well as relative impacts related to traffic and transit.

52-12 The comment states the farmland to the west of the SAP area is a major riparian corridor used by various fauna for movement between the high Sierras and grasslands and that the CISGP would preserve more food and shelter plants for wildlife. The Essential Habitat Connectivity linkage cited in the comment is located mostly outside of the project area; therefore, the project would not impede use of the corridor. As noted in the CISGP, the corridor ends at the City of Roseville just south of the project site. Therefore, development of the SAP area would not eliminate linkages between large blocks of intact habitat or natural landscape. Since the CISGP would also result in development in the project area, impacts on this connectivity corridor would be essentially the same under both plans.

The Draft EIR acknowledges under Impact 4.4-8: Interfere substantially with wildlife movement (page 4.4-68) that the project would interfere with the movement of native resident wildlife species by developing large areas of natural habitat and eliminating connectivity across large portions of the project area and that the impact would be significant. Mitigation Measures 4.4-8a, 8b, and 8c are provided to reduce significant impacts on wildlife movement. As noted on page 4.4-70, successful implementation of these measures would minimize potentially significant impacts related to wildlife movement because these measures would require maintenance of interconnected natural areas sufficient to accommodate wildlife movement, which would protect biodiversity and sustain ecosystems. These measures would also require provision of a movement corridor linking the open space preserves in the PRSP area to Reserve/Mitigation Preserve areas to the north, reducing habitat fragmentation and eliminating risks from dead-end corridors in the PRSP area. It would also allow safe wildlife movement through the PRSP area by requiring wildlife crossings be incorporated into road designs where they dissect the open space preserves. However, implementation of Mitigation Measure 4.4-8a falls outside the County's jurisdiction, and the feasibility of incorporating wildlife movement features into the design of Placer Parkway is uncertain. Although implementation of this mitigation measure, along with measures 4.4-8b and 4.4-8c, would reduce the impact to a less-than-significant level, because the feasibility is uncertain and the County cannot enforce the measure, the impact remains potentially significant and unavoidable.

See Master Response 2: Citizen-Initiated Smart Growth Plan regarding the level of impact reduction achieved by the CISGP and the feasibility issues associated with the CISGP. Also, see Master Response 8: Recirculation.

52-13 The comment claims that the CISGP would reduce GHG emissions from several sources of GHG emissions. See Master Response 2: Citizen-Initiated Smart Growth Plan, which explains that the CISGP would likely result in greater levels of GHG emissions than the proposed project.

The comment also states that the CISGP would reduce annual emissions of criteria air pollutants and precursors compared to the project, as well as provide greater carbon storage potential. See Master Response 2: Citizen-Initiated Smart Growth Plan, which explains that the CISGP would likely result in greater levels of air pollutant emissions than the proposed project.

The comment suggests that the Draft EIR should be recirculated to include 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. Also See Master Response 8: Recirculation.

The comment questions the difference between several projections in employment based on project buildout. As explained in the Draft EIR on page 4.12-8, the market analysis conducted indicated that the project area could support up to 15,300 jobs by 2035. However, as explained on page 4.12-8 in

the next sentence, the Draft EIR uses a different methodology to quantify the potential number of new jobs by applying commonly-used rates of the number of employees per square foot or acre of non-residential development. It is also important to note that the employment projection of 40,804 jobs presented in Draft EIR Table 4.12-7 for the SAP represents full buildout of the entire SAP which would occur over 80 years, far beyond the market analysis buildout horizon of 2035. No revisions to the Draft EIR are necessary.

Regarding the comments raising issues with the assumptions made for the EMU, see response to comment 52-3. The Draft EIR identifies land uses for the trip generation and VMT estimates that are conservative such that the range of allowed uses identified in the SAP for the EMU would not be more traffic- or GHG-intensive than what was evaluated in the Draft EIR.

For the comment addressing the carbon offset credits, see the response to comment 12-12.

For GHG mitigation measures suggested by comments, see Master Response 5: Greenhouse Gas Mitigation.

- 52-14 The comment asks whether it is legal for the Draft EIR to rely on project level environmental review and mitigation, specifically related to the Pleasant Grove Retention Facility. As described in Chapter 3 of the Draft EIR, "Project Description," the Pleasant Grove Retention Facility is being evaluated as part of the proposed project. The comment incorrectly states that the Pleasant Grove Retention Facility has not yet gone through environmental review. The City of Roseville certified an EIR for the Pleasant Grove Retention Facility (City of Roseville Retention Basin Project EIR, State Clearinghouse Number 2000022007). See page 4-5 of the Draft EIR for more information. As explained on page 4-5, the Pleasant Grove Retention Facility, contemplated and analyzed at a project-level herein as a larger facility than that evaluated by the City of Roseville in 2002, would be expanded to provide needed stormwater volumetric retention for the net SAP and PRSP areas and is an essential feature of the project. Although other alternatives are available, conveyance of project-site stormwater to this future expanded facility would best meet project objectives.

The comment raises a question regarding the reason why the Pleasant Grove Retention Facility would not be subject to the SAP policies. The Pleasant Grove Retention Facility would be implemented by the City of Roseville and would be located within the City and outside the SAP area, which is located entirely within Placer County. Therefore, SAP policies cannot be applied to the Pleasant Grove Retention Facility because it is both outside the SAP area and outside the County's jurisdiction.

The comment suggests that use of Lakeview Farms would require installation of storm drains under Auburn Ravine. This is not correct. If Lakeview Farms is used, it would provide off-site retention capacity that would compensate for the increased peak stormwater associated with urban development, which would prevent downstream flooding. No physical connection between the project site and Lakeview Farms would be necessary.

The comment raises questions regarding funding for the Pleasant Grove Retention Facility and suggests that the project depends entirely on implementation of the Pleasant Grove Retention Facility. This is also incorrect. Chapter 3 of the Draft EIR, "Project Description," is clear in describing how the Pleasant Grove Retention Facility would be paid for and also the drainage options that would be implemented if the Pleasant Grove Retention Facility is not used to accommodate project retention needs. The full text of this discussion in the Draft EIR (from page 3-58) is provided below:

To minimize impacts associated with increases in stormwater volume within the Pleasant Grove Creek watershed, retention is proposed to occur within the City of Roseville's proposed Pleasant Grove Retention Facility, which would be located on the Reason Farms property southwest of the SAP area along Pleasant Grove Creek. This approach would require a cooperative agreement between the City of Roseville and Placer County for basin

construction and maintenance paid through a fee collected by the County or County/City or an equivalent mechanism that fully funds the project. At such time that adequate funds have been collected, facilities would be constructed with sufficient capacity to meet the project's stormwater retention needs as well as larger, regional needs. If the City and County are unable to memorialize a joint retention facility agreement, construction of equivalent retention facilities, whether on-site or off-site elsewhere, would be required. (Note that this EIR assumes that Pleasant Grove Retention Facility would be used for off-site retention; if a different off-site facility is needed for retention in the Pleasant Grove Creek watershed, additional CEQA review would be required.) Lastly, interim on-site retention facilities may be implemented for various projects in the SAP and PRSP areas unless or until the Pleasant Grove Retention Facility is operational or other permanent equivalent facilities are available for retention.

52-15 The comment asks whether it is possible for the SAP and PRSP to meet stormwater regulation designed to prevent water quality impacts without the use of PGRF. As discussed in Impact 4.9-1, if the PGRF cannot accept stormwater from the PRSP area, either on a short-term or long-term basis, alternative stormwater retention locations are available. See response to comment 52-14 above.

52-16 The comment asks how long existing 100-year floodplain protections will remain viable in light of global climate change and rising sea levels. The 100-year floodplains in the SAP area are located along low-flow streams that are intermittent under natural conditions. Additionally, the SAP area is located 75–195 feet above mean sea level and is outside of the elevation range anticipated to experience direct effects from sea level rise.

52-17 The comment states that the SAP is mitigating the impact to freeway operations (Impact 4.14-10 of the Draft EIR) by providing incentives to build housing that will comply with Bus Rapid Transit compatible design. As described in Mitigation Measure 4.14-10, the proposed project would contribute its fair share toward feasible physical improvements to the state highway system, specifically SR 65 and I-80. The BRT compatible design items mentioned in the comment would facilitate transit use, which may help reduce traffic demand on the state highway system. However, the Draft EIR traffic analysis shows that physical improvements to SR 65 are also necessary to improve traffic operations (i.e., level of service).

The comment makes comparisons between the project and the CISGP regarding densities to support bus rapid transit. See Master Response 2: Citizen-Initiated Smart Growth Plan.

52-18 The comment summarizes the Draft EIR conclusion that Impact 4.12-1, population growth from new homes and businesses, would be significant and unavoidable, and further states that the CISGP would reduce this impact. Master Response 2: Citizen-Initiated Smart Growth Plan provides a detailed discussion regarding the CISGP. As indicated in the master response, implementing the CISGP would result in over four times more direct population growth than would occur under the SAP/PRSP and nearly three times more employment. The CISGP includes six times more residential units and double the amount of commercial/industrial floor area. The comment's suggestion that the CISGP would result in a reduction in impacts related to population growth is not accurate.

The comment then describes the "per household" reductions in air pollutant and GHG emissions that would be achieved under the CISGP. However, the comment does not address the total emissions, which would be much higher under the CISGP than under the SAP/PRSP. See Master Response 2: Citizen-Initiated Smart Growth Plan for more detail.

52-19 The comment erroneously claims that Impact 4.14-2 is less than significant and expresses disagreement with a less than significant finding. The Draft EIR identifies Impact 4.14-2 as a significant impact. The Draft EIR discloses that the project's impact at several locations would be significant and unavoidable in the short-term until applicable roadway network improvements are implemented. The project's contribution toward some of these improvements are reliant on an

update to the Placer County Countywide CIP and countywide traffic impact fee to cover these locations. The impact would be reduced to less than significant after the implementation of Mitigation Measures 4.14-2a through 4.14-2c and updates to the Placer County Countywide CIP and countywide traffic impact fee so that the project contributes its fair share toward the necessary improvements.

The comment also claims that the CISGP would reduce this impact by reducing vehicle mile trips (i.e., vehicle miles of travel or VMT). See Master Response 2: Citizen-Initiated Smart Growth Plan for additional information regarding the VMT generation of the CISGP compared to the Draft EIR impact analysis.

- 52-20 The comment is virtually the same as comment 52-19, above, with regards to Impacts 4.14-3, 4.14-4, 4.14-5, 4.14-6, 4.14-9, and 4.14-12 in the Draft EIR. See response to comment 52-19 and Master Response 2: Citizen-Initiated Smart Growth Plan for additional information regarding the VMT generation of the CISGP compared to the Draft EIR impact analysis.
- 52-21 The comment suggests that the Draft EIR disclose that funding for improvements to SR 65 and I-80 has not been identified. Mitigation Measure 4.14-10 in the Draft EIR acknowledges that the payment of impact fees, such as the Highway 65 JPA Fee and SPRTA Fee, only provide partial funding to the improvements to SR 65 and I-80. Therefore, the Draft EIR concludes that the project's impact is significant and unavoidable as shown on page 4.14-87.
- 52-22 The comment expresses disagreement with the project is consistent with the Placer County General Plan as stated in Impact 4.15-10. The comment provides references to the housing proposed by the project and the CISGP. The comment suggests that the Draft EIR be revised to expressly state that the housing units associated with Sac State—Placer Center would not be counted toward the number of required affordable housing units. Finally, the comment suggests that the Draft EIR be recirculated to allow public evaluation of the CISGP as the environmentally superior alternative.

Impact 4.15-10 of the Draft EIR evaluates consistency with general plan policies regarding utilities, not housing as may have been interpreted by the commenter. Impact 4.12-1 evaluated impacts related to population growth and noted that 10 percent of housing in the PRSP area would be affordable and that while the affordability of housing in the net SAP area is not yet know, development would be required to comply with the County's General Plan (see page 4.12-11). Affordable housing locations in the PRSP area are identified in new Exhibit 3-1 provided in response to comment 18-3.

See Master Response 8: Recirculation and Master Response 2: Citizen-Initiated Smart Growth Plan.

- 52-23 The comment expresses concern over the enforceability of the construction-related mitigation required under Impact 4.3-2 and then extends the concern to mitigation throughout the Draft EIR. The comment does not raise specific concerns related to the mitigation text. The Draft EIR identifies the agency responsible for monitoring and enforcing mitigation. Taking Mitigation Measure 4.3-2a, as an example, the text states that project proponents shall require their construction contractors to implement all of PCAPCD's recommended construction mitigation measures in place at the time of grading/improvement plan submittal. Therefore, the County is ultimately responsible for ensuring the measures are in place prior to approving the grading/improvement plans. However, individual measures specify that various components be submitted to PCAPCD; this is where PCAPCD would apply its recommendations identified in the stated text above.

Because the commenter does not identify specific issues with the mitigation measures, and because the Draft EIR clearly identifies monitoring and enforcement responsibility with respect to the mitigation measure that the commenter raises as an issue, no additional response is warranted.

52-24 The comment summarizes the Draft EIR conclusion that Impact 4.2-1, conversion of farmland to a nonagricultural use, would be significant and unavoidable. More specifically the comment indicates Mitigation Measures 4.2-1a and 4.2-1b, which require preservation of converted Farmland, are incomplete, inadequate, unenforceable. These issues are similar to the issues raised in comment 12-11. See response to comment 12-11 for a detailed response regarding this mitigation. It should be noted that some land preserved under the PCCP may qualify as Farmland; therefore, land protected pursuant to the PCCP for preservation of habitat, which also qualifies as Farmland, could count toward the mitigation requirements of Mitigation Measure 4.2-1a, given compliance with the other requirements identified in the mitigation measure.

The comment indicates that Mitigation Measure 4.2-1a does not define “substantial portion” with respect to land that is undeveloped. The mitigation measure leaves this determination to the County’s agricultural commissioner. However, the intent of the phrase is to not eliminate Farmland from preservation when the land is undeveloped aside from structures appurtenant or accessory to the agricultural use (i.e., rural single-family homes, barns, sheds, etc.). The County’s agricultural commissioner is qualified to make this determination. No revision to the Draft EIR is necessary.

Regarding the comment that the economic value of the “ecosystem services” provided by the farmland were not addressed in the Draft EIR, CEQA does not require the EIR to consider non-environmental issues, such as social or economic issues. No changes to the Draft EIR are required.

The comment also suggests that land preserved for habitat mitigation should not be counted toward Farmland mitigation because “land used for farming is generally not habitat.” This is incorrect. Depending on the specific crop or function (i.e., grazing), Farmland may provide habitat for wildlife species including nesting habitat for western burrowing owl and foraging habitat for many species of raptors and other birds, including tricolored blackbird (*Agelaius tricolor*). Alfalfa, disked fields, fallow fields, and grain and hay crops, for example, tend to support large rodent populations and therefore provide good foraging habitat for Swainson’s hawk (*Buteo swainsoni*), white-tailed kite (*Elanus leucurus*), northern harrier (*Circus cyaneus*), and more common raptors. Furthermore, to qualify as part of the preserve system under the PCCP, the land identified for preservation must meet criteria demonstrating it meets habitat requirements for covered species. The fact that a piece of land also meets the criteria for Farmland would not detract from its qualities as habitat for certain species.

Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan.

**From:** Daniel Ketchum <djketchum@gmail.com>  
**Sent:** Thursday, February 21, 2019 5:59 PM  
**To:** Shirlee Herrington  
**Subject:** Re: Sunset Area Plan/Placer Ranch Specific Plan DEIR Report - State Clearinghouse No. 2016112012, Vol. 1&2

<b>Letter</b> <b>53</b>
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February 21, 2019

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

Re: Sunset Area Plan/Placer Ranch Specific Plan DEIR Report - State Clearinghouse No. 2016112012, Vol. 1&2

Dear Ms. Herrington:

Thank you for the opportunity to comment on the December 2018 Draft Environmental Impact Report (DEIR) for the Sunset Area (SA) Plan and the Placer Ranch Specific Plan (PRSP) areas. I ask that the DEIR be revised to include alternative plans to mitigate significant and unavoidable impacts upon public health. I also request the County consider alternative plans for this project that induces quality land use, transit and smart growth for the project and surrounding areas.

I have several concerns with the DEIR, including:

- Population Growth and Employment
  - A Sacramento State college campus is expected, along with a regional retail district. This will result in generally lower paying wage jobs that cannot support existing housing costs.
- Housing
  - Over 5000 low-density housing units are planned within 1000 feet of the Western Regional landfill. The impact of the landfill on these units is not fully mitigated in the DEIR.
- Traffic
  - A multi-lane expressway is planned which will greatly increase local traffic and worsening air quality in the area. Traffic on Hwy 65 is expected to exceed 800,000 new trips/day.
- Environment
  - The DEIR does not complete studies of the cumulative and undesirable impacts on several species of birds and reptiles, and does not fully address the effect of a loss of over 7,000 acres of farmland.
- Water Quality
  - Does not fully take into consideration the effect of water runoff downstream.

53-1

Thank you for the opportunity to provide comments on the DEIR. I would appreciate a written response.

Respectfully submitted,  
 Daniel Ketchum  
 2072 Devonport Loop  
 Roseville, CA. 95747

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<b>Letter</b> <b>53</b>	Daniel Ketchum February 21, 2019
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- 53-1 The comment requests that the Draft EIR be revised to include alternative plans to mitigate significant and unavoidable impacts and to include alternatives to the project that induce quality land use, transit, and smart growth. Section 5.1, “Significant and Unavoidable Impacts,” of the Draft EIR lists the project’s significant and unavoidable impacts. See response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts. As to the comment about alternatives to the project, see Master Response 1: Alternatives Analysis.

The remainder of the comments expresses concern with the Draft EIR, including in the areas of population growth and employment, housing, traffic, biological resources, and water quality. These issues are addressed in their respective sections of the Draft EIR. More detailed responses are provided below for the detailed comments.

Regarding housing, the comment states that the impact of the landfill on the proposed housing units is not fully mitigated in the Draft EIR. This issue is addressed in Section 4.10, “Land Use,” of the Draft EIR, under Impact 4.10-2. Mitigation Measure 4.10-2 would require odor control measures for specific plans; however, as described on page 4.10-18, the impact would be significant and unavoidable even after mitigation. See response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts. The comment expresses concern related to the Draft EIR’s conclusions but does not identify issues related to the *adequacy* of the Draft EIR’s analysis or conclusions.

Regarding traffic, the comment indicates that the project would increase local traffic and worsen air quality. The commenter does not identify specific issues with the Draft EIR’s analysis.

Regarding biological resources, the comment states that the Draft EIR does not address cumulative impacts on several species of birds and reptiles and does not address the loss of farmland. Impacts to biological resources are addressed in the Draft EIR in Section 4.4, “Biological Resources.” The comment does not specify what species of birds and reptiles are not addressed; however, page 4.4-15 lists the species that were considered but eliminated from further evaluation. On this same page, the Draft EIR explains why these species were not evaluated further, including lack of suitable habitat in the project area or vicinity, limited range for the species that does not include the project area, and (specific to bird species) absence of nesting in the region and the species are of conservation concern only within their nesting range. Project-level impacts are evaluated under Impacts 4.4-1 through 4.4-10, and cumulative impacts are evaluated under Impacts 4.4-11 through 4.4-19. Loss of Farmland is addressed in the Draft EIR in Section 4.2, “Agricultural Resources,” under Impact 4.2-1, conversion of Farmland to a nonagricultural use; as described therein, this impact would be significant and unavoidable even after mitigation. Contrary to the commenter’s assertions, the Draft EIR does address the project’s cumulative impacts on birds and reptiles and does address the loss of Farmland that would result from the project. No evidence is provided to the contrary in this comment.

Regarding water quality, the comment states that the Draft EIR does not fully take into consideration the effect of water runoff downstream. This issue is addressed in Section 4.9, “Hydrology and Water Quality,” of the Draft EIR, under Impact 4.9-1, increased stormwater runoff and potential for downstream flooding. Mitigation Measures 4.9-1a and 4.9-1b would require the submittal of an improvement plan and final drainage report that provide details on how to achieve specific requirements related to stormwater runoff peak flows volumetric increases; however, as described on page 4.9-32, the impact would be significant and unavoidable even after mitigation. Contrary to the commenter’s assertion, the Draft EIR does evaluate the project’s downstream effects. No evidence is provided to the contrary in this comment. Note that County staff revised Mitigation Measure 4.9-1b as shown in response to comment 1-4 and in Chapter 2, “Revisions to the Draft EIR.”

**From:** Lisa Larkin <lll@aceweb.com>  
**Sent:** Thursday, February 21, 2019 4:46 PM  
**To:** Shirlee Herrington  
**Subject:** Re: Sunset Area Plan/Placer Ranch Specific Plan

<b>Letter 54</b>
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Ms. Shirlee Herrington  
 Placer County Community Development Resource Agency  
 Environmental Coordination Services  
 3091 County Center Drive, Suite 190  
 Auburn, CA 95603  
 Email: [sherring@placer.ca.gov](mailto:sherring@placer.ca.gov)

Re: Sunset Area Plan/Placer Ranch Specific Plan DEIR Report - State Clearinghouse No. 2016112012, Vol. 1&2

Dear Ms. Herrington:

Thank you for the opportunity to review the December 2018 Draft Environmental Impact Report (DEIR) for the Sunset Area (SA) Plan and the Placer Ranch Specific Plan (PRSP) areas. Review is in accordance with the California Environmental Quality Act ("CEQA") and Public Resources Code, Section 21000, et.seq. CEQA requires the County address and fully mitigate the effects of the plan upon public health and natural resources, etc. It is noted the County used Ascent Environmental Company to gather data and methodology used in your Tables. However, upon further review, we find the DEIR reveals over 60 significant and unavoidable impacts in almost every category. Negative impacts will impose serious consequences upon public health, air quality, housing, wildlife, and mobility in the proposed Placer Parkway transportation systems if this plan were to go forward as presented in the DEIR. (See Exhibit 1-2 Proposed PRSP Land Use Plan)

54-1

**Population/Employment/Residential Impacts in Special Plan Areas:**

The DEIR, a voluminous environmental draft document covers a dynamic area and will serve as a guide to growth of over 8,047 acres of land located in the western portions south Placer County. A specific plan, the Sunset Area (SA) Plan located within the City of Roseville and surrounding many existing neighborhoods where a future buildout of (yet undetermined) Sacramento State college campus is expected. The college campus combined with surrounding land uses projects an increase in student population of up to 30,000 students at buildout. A regional retail district is included in SA which is twice the size of the Galleria, Fountains, and adjacent box stores combined; and will compete with existing retail in Lincoln, Rocklin and Roseville. The inclusion of more retail will result in low paying wage jobs that will not support the costs of housing and accompanied lack of transit alternatives in this project will cause unwarranted vehicular congestion and negative impacts upon air quality. The DEIR offers no alternative transit opportunities for students and residents to ameliorate the negative and significant impacts of this project upon public health.

54-2

Housing alternatives are not fully mitigated in the DEIR. The location of SA area plan in Lincoln/Rocklin includes the addition of 5,636 low density housing units to be built within 1000 feet of Western Regional sanitation plant/Landfill facility with no adequate buffer from odor, nor mitigation to better the expected negative health consequences upon public. Landfill and Buffers: (See Land use 4.10.1) which allows residential developments close as 1000 feet and suspected odors will affect public health. According to the DEIR (Section 4.3-5), the Western Placer Waste Management Authority is actively engaged in yet incomplete studies concerning odors and mitigation of such the nature, and effectiveness of studies or strategies are as yet unknown, no quantifiable thresholds of significance for odor impacts is offered in the DEIR, and no existing fee program or other mechanisms is contemplated in order to fund the costs of odor mitigation in the DEIR. This impact would be significant upon the public health if not fully mitigated in the DEIR.

**Transportation and Traffic and Air Quality Placer Parkway (PP):**

A Multi-land expressway included in the plan offers no other transit alternative that reduces expected increase in CO2 emissions from increased vehicular traffic upon local project roadways. Such an increase in traffic will negatively affect air quality standards imposed by the California Air Resources Board (ARB) with no alternative transit mentioned in the DEIR. PP creates significant roadway construction and right of ways in the planning areas; noise, air quality are considered unavoidable and significant. Long-term emissions exceed maximum allowed under the ARB guidelines with no off-site mitigation plan and significant/unavoidable effects upon public health. Toxic air contaminants will exist within 500 feet of Hwy 65 which currently experiences up to 100,000 vehicle trips per day. Hwy 65 will be congested with at least 895,317 new daily vehicle trips per day (this does not include surrounding freeways I-80 and I-50 which will connect to the proposed Placer Parkway). Significant negative impacts need to be fully mitigated to avoid serious impacts of bad air quality upon Placer residents.

54-3

**Environment/Land:**

The DEIR does not complete studies of the cumulative and undesirable impacts upon local species (reptiles, birds, migration, habitat, swainson hawk, etc.) no existing alternative no mitigation study fully addresses the effects upon the loss of 7,297 acres of farmland, species, fauna/flora, and vernal pools as per CEQA Guidelines section 15082(a) (1) will require specific mitigation studies not mentioned in the DEIR. The most significant effects are shown in Table 4.2-1 DEIR as farmland is proposed to be converted to non-ag use, a significant impact upon farmland production for the Placer/SACOG region.

54-4

**Water Quality:**

In the DEIR, under the SAP and the PRSP Plan, storm water runoff from Auburn Ravine and Pleasant Grove Creek, all nearby watersheds lack a strong CEQA analysis on the impacts of water runoff downstream, including viable mitigation and unavoidable significant impacts of adjacent areas (unincorporated) outside of the county boundaries. Therefore, the DEIR is not taking into consideration the effects of the combined watersheds which may have a significant negative impacts upon water runoff in our Placer communities upon full buildout of the project plan areas.

54-5

I respectfully request the DEIR be revised to include alternative plans to mitigate significant and unavoidable impacts upon public health. I also request the County consider alternative plans for this project that induces quality land use, transit and smart growth for the project and surrounding areas. Please consider the Citizen Initiated Smart Growth Plan created by the Alliance for Environmental Leadership. Please revise the DEIR and recirculate to the public for further review and consideration. Thank you for the opportunity to provide comments on the DEIR. Please provide your written response to the address stated below.

Extremely concerned citizen,



Signed: 2/21/2019  
Lisa Larkin  
21 Castle Hill Ct, Roseville, CA, 95678

<b>Letter 54</b>	Lisa Larkin February 21, 2019
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- 54-1 The comment states that CEQA requires the County to address and fully mitigate the effects of the project on public health and natural resources, etc. This statement is inaccurate. Section 15126.4 of the State CEQA Guidelines describes the requirements related to mitigation measures, which specify that an EIR “shall describe feasible measures which could minimize significant adverse impacts.” CEQA defines mitigation as avoiding an impact; minimizing effects to a degree; rectifying an impact through rehabilitation, restoration, etc.; reducing the impact over time by preservation and maintenance actions; or compensating for an impact by replacing or providing substitute resources (State CEQA Guidelines Section 15370). Further, the State CEQA Guidelines (Section 15126[b]) require that EIRs identify the significant environmental effects of a proposed project that cannot be reduced to a less-than-significant level (also termed significant and unavoidable impacts). See response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts. Thus, contrary to the commenter’s assertion, CEQA does not require EIRs to fully mitigate project impacts, but rather to describe feasible mitigation to minimize significant impacts and identify those impacts that cannot be reduced to a less-than-significant level.

Mitigation measures are identified throughout the Draft EIR to reduce potentially significant and significant impacts (see Table 2-1 in the Executive Summary for a summary of the project’s impacts and mitigation measures). Where mitigation is unavailable or available but unable to reduce impacts to below the thresholds of significance, impacts are determined to be significant and unavoidable (see Section 5.1, “Significant and Unavoidable Impacts,” of the Draft EIR, which lists the project’s significant and unavoidable impacts). Therefore, the Draft EIR complies with CEQA requirements for mitigation measures.

The remainder of the comment expresses concern about the project’s effects on public health, air quality, housing, wildlife, and the transportation system. These issues are addressed in their respective sections of the Draft EIR. No specific issues related to the adequacy of the content, analysis, or conclusions in the Draft EIR are raised in this comment. No further response is warranted. See responses to the detailed comments below.

- 54-2 The comment primarily describes the project details. Otherwise, the primary issues raised are wages associated with employment generated by the project, traffic congestion and associated air quality impacts, and impacts related to placing sensitive receptors near the landfill. Regarding the suggestion that the project would result in low wages, one of the primary objectives of the SAP is to create primary wage-earner jobs for nearby residents. However, this is not an environmental issue and does not require further response. Regarding the increase in traffic and associated air quality impacts, these issues are discussed in detail in the Draft EIR (Section 4.3 addresses air quality, and Section 4.14 addresses traffic impacts). The comment indicates that the Draft EIR does not identify alternative transit opportunities to reduce these impacts. However, the Draft EIR identifies several SAP policies that would require the project to contribute funding to local and regional transit agencies. These include the following measures:

- ▲ SAP Policy NR-7.4: Transit Funding, which states, “The County shall require new development to pay its fair share of the cost of transit facilities required to serve the new development;”
- ▲ SAP Policy TM-3.5: Transit Service, which states, “The County shall require fair share funding contributions by new development subject to discretionary review... for implementation of transit services to meet future demand;” and
- ▲ SAP Policy TM-3.1: Transit Service Planning, which states, “The County shall collaborate with neighboring transit agencies to update plans to include transit service to the Sunset Area... This

update would include a funding mechanism for the establishment and operation costs of transit service to the Sunset Area.”

There are also mitigation measures included in the Draft EIR that require the project to contribute transit funding, including the following:

- ▲ Mitigation Measure 4.14-13a, which states, “The County shall prepare a transit master plan for the SAP area, including the PRSP area.” This mitigation measure requires coordination with Placer County Transportation Planning Agency and Roseville Transit.
- ▲ Mitigation Measure 4.14-13b, which states that “a Community Service Area (CSA) Zone of Benefit (ZOB) shall be established by the project proponent, or the project proponent shall annex into an existing CSA ZOB to fund the cost of transit services proposed by the Transit Master Plan. This will include any related capital costs for buses, passenger amenities, and facilities.”

Regarding the issue of placing residents near the landfill, See Master Response 4: Odors, which addresses these issues.

- 54-3 The comment asserts that Placer Parkway does not offer transit alternatives and would increase traffic and negatively affect air quality and noise. The comment asserts that long-term emissions exceed CARB guidelines and that toxic air contaminants will exist within 500 feet of SR 65. The comment also incorrectly asserts the project would result in an increase of 895,317 daily trips on SR 65.

See response to comment 4-25 regarding the previous environmental review that has been completed for Placer Parkway. This previous environmental review addressed the potential traffic, air quality, and noise impacts of Placer Parkway. Impact 4.14-13 of the Draft EIR describes the proposed project’s transit impacts and acknowledges that a planned BRT route would provide service through the PRSP area and western Placer County. Policy TM-3.1 in the SAP commits the County to update its Long Range Transit Master Plan to include transit service to the SAP area and identify funding to establish and operate this service. Mitigation Measures 4.14-13a and 4.14-13b reinforce this commitment to plan for and provide transit service to the project.

The increase in daily vehicle trips on SR 65 cited in the comment is overstated. Table 4.14-35 on page 4.14-106 of the Draft EIR presents the daily trip generation at buildout of the SAP. This table shows that 561,635 daily trip ends are generated at buildout of the SAP. However, some of these trip ends would remain internal to the SAP area (i.e., begin and end within the SAP area). Therefore, the number of external trips would be less, and the amount using SR 65 would be only a portion of those external trips.

The comment also raises air quality concerns that correspond to the traffic concerns expressed. The Draft EIR evaluates impacts related to air quality (See Section 4.3), which uses traffic data provided from the Transportation Impact Study (included as Appendix M of the Draft EIR). The Transportation Impact Study is also used as the primary data source for evaluating traffic impacts (See Draft EIR Section 4.14). The Draft EIR’s air quality analysis also specifically evaluates impacts related to health risk of sensitive receptors located near high-traffic-volume roadways (See Impact 4.3-5, “Exposure of sensitive receptors to TACs”).

- 54-4 The comment states there is no alternative or mitigation to fully address impacts to farmland, local species of fauna and flora (e.g., reptiles, birds, migration, habitat, Swainson’s hawk), and vernal pools.

Regarding the comment about loss of farmland, see responses to comments 12-11, 63-1, and 65-1.

See response to comment 52-11 for list of policies, programs, and mitigation measures provided in the Draft EIR to mitigate impacts on flora/fauna and wetlands, including vernal pools. The following mitigation measures are presented in the Draft EIR to address impacts on special-status species:

- ▲ Mitigation Measure 4.4-5a reduces potential impacts on western pond turtle, burrowing owl, Swainson's hawk, and tricolored blackbird by requiring preconstruction surveys, avoidance of active nests, take avoidance, and compensation for loss of occupied habitats.
- ▲ Mitigation Measure 4.4-5b reduces potential impacts on northern harrier, white-tailed kite, and other nesting raptors by requiring preconstruction surveys and avoidance of active nests.
- ▲ Mitigation Measure 4.4-5c reduces potential impacts on loggerhead shrike, song sparrow, and grasshopper sparrow by requiring preconstruction surveys and avoidance of active nests.
- ▲ Mitigation Measure 4.4-5d reduces potential impacts on bat roosts by requiring preconstruction surveys and avoidance of active roosts.
- ▲ Mitigation Measure 4.4-5e reduces potential impacts on American badger by requiring preconstruction surveys and avoidance of active dens.
- ▲ Mitigation Measure 4.4-5f reduces potential impacts on special-status reptile, bird, and mammal species in off-site improvement areas by requiring coordination with the City of Roseville for appropriate mitigation.

As noted on page 4.4-64 of the Draft EIR, with implementation of these measures, the project would not substantially affect the distribution, breeding productivity, viability, or the regional population of any special-status reptile, bird, and mammal species. Therefore, potential impacts to special-status reptile, bird, and mammal species within the County's jurisdiction would be reduced to a less-than-significant level.

The Draft EIR contemplates Alternative 3: Reduced Footprint, Reduced Development Potential (Section 6.4.3 of the Draft EIR) and Alternative 4: Reduced Footprint, Similar Development Potential (Section 6.4.4 of the Draft EIR). Each of these alternatives would increase the amount of vernal pool core recovery area preserved by 1,467 acres compared to the proposed project and would therefore reduce impacts on local flora/fauna, vernal pools, and special-status species. See Draft EIR Chapter 6, "Alternatives."

- 54-5 The comment makes the claim that the Draft EIR does not appropriately consider the downstream effects of increased stormwater runoff. The Draft EIR assesses the potential for increased stormwater runoff and downstream flooding in Impact 4.9-1. The Draft EIR also includes an analysis of cumulative water quality impacts from urban land uses that considers the project contribution to water quality impacts in the context of the planned development in the vicinity. See Draft EIR page 4.9-47. For additional information, see Master Response 6: Drainage and Flooding, which provides additional detail related to the analysis of flood effects and potential downstream effects.

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.

**From:** Deanna Marsh <deanna@central-park-studio.com>  
**Sent:** Thursday, February 21, 2019 9:41 AM  
**To:** Shirlee Herrington  
**Subject:** Placer Ranch DEIR comment

<b>Letter</b> <b>55</b>
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Dear Ms. Herrington:

I've been closely following the development of the Citizen Initiated Smart Growth Plan by AEL. I strongly urge our county to use it as a template for considering the future of our development opportunities. It is truly a structured analysis of 21<sup>st</sup> century ways of managing growth that will be healthier for Placer County.

The Draft EIR for the Sunset Industrial Area Project and the Placer Ranch Specific Plan revealed 60 significant and unavoidable impacts to the environment that will cause health, safety and quality of life impacts to the public, create a jobs housing imbalance that will exacerbate the existing available housing crisis, put resident and migratory animal species at risk of extinction and jeopardize the planet with GHG. The DEIR is incomplete and inadequate because it fails to suggest, or properly analyze, an Alternative Project that that lessens adverse and unavoidable impacts to a less than significant level. The absence of such an Alternative does not allow the County to make an informed decision about the Project. I respectfully request that you recirculate the DEIR and 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.

55-1

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

Sincerely,

Deanna Marsh  
 3144 Manhattan Bar Rd., Auburn

<b>Letter</b> <b>55</b>	Deanna Marsh February 21, 2019
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55-1 The comment summarizes and expresses concern about the project’s significant and unavoidable impacts. These are also listed in Section 5.1, “Significant and Unavoidable Impacts,” of the Draft EIR. Also, see response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts. The comment further states that the Draft EIR is incomplete and inadequate because it does not include an alternative that would reduce the project’s significant and unavoidable impacts to less-than-significant levels. See Master Response 1: Alternatives Analysis. For the reasons described in that master response, the Draft EIR includes a reasonable range of alternatives, and the alternatives analysis is adequate.

Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, 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. Also see Master Response 8: Recirculation.

February 12, 2019

Letter  
56

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

Dear Ms. Herrington and Chair and Members of the Placer County Planning Commission:

I have reviewed the County’s Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County:

**Does not meet Objectives**

In Placer Ranch Specific Plan Primary Objectives (6-3), the DEIR states that, “development of the Placer Ranch community is designed to function as a stand-alone project *that is consistent with the goals and policies of the Sunset Area Plan.*” Placer Ranch undermines several objectives of the Sunset Area Plan.

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

56-1

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

56-2

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

56-3

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

56-4

Placer Ranch also struggles to meet its own objectives.

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

56-5

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

56-6

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

56-7

**Establish Open Space for Habitat Conservation- Drainage:** PR does not provide the design detail required for evaluation or any corroborative research to prove with reasonable certainty the effectiveness of open space drainage plan. It fails to address the stream course setback, flood plain, stream width, stream order and meander amplitudes in its drainage design. Stream setback for vernal pool habitat in Western Placer County has been specifically studied in, “Setback Recommendations to Conserve Riparian Areas and Streams in Western Placer County” prepared for Placer County Planning Department by Jones & Stokes and PRBO Conservation Service in 2005. The study finds that 1st and 2nd Order Streams must have setbacks of 98 ft. + floodplain and that 3rd Order and Higher Streams must have 656 ft. + floodplain. In the General Plan, Community Plans, of which PR is a part, can designate their own stream course setbacks. This is important for preserving natural drainage in the SA, because the General Plan stream setbacks are too small for vernal pool drainage systems. To see the distance and learn more about the setback problems and how to address them, please see the CISGP, pages 90-97. **An analysis must be done on the efficacy of the open space drainage plan to preserve natural drainage and quality and quantity of discharge throughout the year at the exist point from the project area. This study must include surface and sub-surface watershed analysis, as the loamy soil over hardpan acts as a slow-release sponge, an effect of which is vernal pools.**

56-8

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

56-9

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

56-10

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

56-11

**Enable Blueprint Consistency:** Blueprint consistency starts at the land use level, especially since the Blueprint evaluates land use across the greater Sacramento Region. To see the SACOG vision blueprint for the project area, look at CISGP pg. 18-19. It does not include any low residential development in the SA. For the SA, it encourages industrial in the south-east with a low density mixed use zone. A large amount of the site remains open space and residential encroaches from the north and south. Since 2004, SACOG has tracked development in relation to the blueprint and created preferred build out scenarios. According to SACOG, single family small lot residential has been building out to capacity at an unanticipated fast rate. While the Blueprint is not intended to be used to determine use for any particular area, it's purpose is to guide land use in communities. There is no way that increasing the growth area for residential sprawl is in line with the blueprint.

56-12

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

**Falsely Represents Project through Inconsistent Numbers**

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

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

56-13

**Failure to Evaluate University Location**

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

The County's official vernal pool map shows the entire university site as vernal pools. The mitigation fees for the direct effects alone mitigated through the PCCP are more than \$40 million. The last assessed value of the parcel the university would be a subdivision of was \$20 million. In addition to the outrageous mitigation cost, other avoidable costs such as utility and infrastructure expansion to site and extensive soil engineering will be required. A longstanding notion that this is where the university should go cannot stand in for proper analysis. **As a public university funded with public dollars, a proper location study and financial feasibility study needs to be conducted.** For an example of another location within the SA for the university that avoids these costs, see the CISGP zoning plan.

56-14

**Conflicting Vernal Pool Maps**

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

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

**An onsite vernal pool study over the course of the year must be made for Placer Ranch at this time to effectively evaluate the impacts. Addressing it parcel by parcel after the subdivision has happened *piecemeals* the analysis. In addition, the two conflicting maps must be reconciled at this stage** in order to adequately portray the existing conditions.

56-15

**Placer Parkway as Traffic Mitigation**

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

56-16

**Cumulative Impact on Expansive Soils**

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

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

56-17

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

In addition, the SAP reduces the above ground carbon stock by 973 metric tons and the soil carbon stock by 39,743 metric tons. Collectively that is 40,715 metric tons, the equivalent of 31,962 passenger vehicles driven per year. (See CISGP Carbon Report, pg 69.)

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

56-18

Sincerely,

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

**Letter** | Genevieve Marsh  
**56** | February 12, 2019

56-1 The comment suggests that the PRSP does not adhere to the SAP Unique Land Supply objective. The policy framework of the SAP is intended to support the implementation of the PRSP, which was, in turn, prepared to ensure consistency with the overall vision for development of the Sunset Area. The PRSP is designed as a planned community with varying types of residential uses, a university, job generating uses, and infrastructure development to support the SAP objectives. Page 4, Part 1, of the SAP notes as objective 8, notes as an objective to “Retain the large supply of large development sites in the Sunset Area by discouraging subdivisions that diminish long- term value and foreclose unique development opportunities.” The PRSP implements this goal by master-planning 2,213 residential units under single ownership with varying uses, as noted above, that contribute to many of the other objectives and goals noted within the SAP.

- 56-2 The comment suggests that the PRSP lacks housing diversity. The PRSP includes residential uses that would support an array of housing types, including both single-family detached, and multi-family attached units. This includes areas for age-restricted neighborhoods as well as housing in mixed-use environment within the Town Center. In addition, high-density residential units would be permitted on Commercial Mixed-Use parcels in the Town Center district. Conversely, consistent with the concept of a mixed-use urban core, ground-level commercial uses would be permitted on high-density residential parcels north of Sunset Boulevard, particularly along Town Center Lane. Residential densities greater than 2 dwelling units per acre would be encouraged in the Town Center as well. This approach provides for a diverse mix and range of housing uses within the PRSP area.
- 56-3 The comment suggests that the PRSP creates unwalkable and disconnected communities. The PRSP is designed to create several distinct neighborhoods, visually cohesive and connected by a system of trails for bicyclists and pedestrians. The proposed PRSP mobility system would provide residents, student, and employees multiple options to move through the community. The PRSP also includes a network of street separated shared use paths, Class II bike lanes, public transit, and roadways into a single, comprehensive system. This network also includes linkages to existing/planned bikeways located in the City of Roseville, south of the PRSP area.
- 56-4 The comment asserts that the project fails to fulfill the objective to accommodate walking and that the project's street designs and zoning do not achieve active transportation and walkability. With regard to the project's street design not achieving transportation and walkability, the Draft EIR Exhibit 3-8 (SAP Mobility Map) and Exhibit 3-17 (PRSP Mobility Plan) include Shared Use Paths, intended to serve pedestrians and proved for walkability. These Shared Use Paths are planned along most all of the roadways within the PRSP area. In addition, for all other existing future roadways within the project area, the SAP Corridor Design Standards and Guidelines contained in Appendix A, and the PRSP Mobility Plan contained in Section 7, include provisions that require sidewalk facilities to be constructed to facilitate walkability. Regarding the project's zoning not achieving active transportation, all zone districts in which development is anticipated include streetscapes that provide Shared Use Paths and sidewalk requirements to achieve active transportation. In addition, the SAP Commercial and Entertainment Mixed Use Zones (Chapter 1.01), Research and Development Zones (Chapter 1.02) and Industrial Zones (Chapter 1.03) all include allowances for a mix of uses that would include commercial, office, and housing uses. In addition, the PRSP also allows for a mix of uses, including residential, commercial, and office uses within its commercial and campus park zones, and allows for neighborhood serving commercial uses within its residential zones. The mix of uses and zone district design in the net SAP and PRSP areas is intended to provide a balance of uses aimed to achieve pedestrian friendly design and to achieve active transportation.
- 56-5 The comment suggests that the PRSP does not provide a diverse mix of land uses and a financial study should be carried out to determine the financial burden put upon the County by the development. See response to comment 56-2, above, regarding diversification of residential uses. In addition, the PRSP is planned for approximately 5.5 million square feet of non-residential uses as well as a university to serve the higher education needs of Placer County. Page 10-4 of the PRSP notes that a financing plan has been prepared for the PRSP that outlines the cost for all backbone infrastructure needed to serve the different development phases and include a plan with funding mechanisms, to construct the public facilities within the PRSP area. The Specific Plan pages 10-6 to 10-7 note the mechanisms in which maintenance obligations and service level increases may be funded.
- 56-6 The comment suggests that feasibility studies have not been done regarding the University's location or financial feasibility. A market study was prepared by EPS for the PRSP and SAP. The study included the University site and did not conclude that the PRSP would be financially infeasible. Furthermore, the PRSP included several utilities master plans, including water, recycled water, wastewater, and dry utilities. An urban water supply assessment was also provided by PCWA confirming that water supply is available to serve the project. Also, the suggestion that the PCCP

mitigation cost \$40 million is inaccurate. See Master Response 3: Placer County Conservation Program and Mitigation for a detailed discussion about the PCCP. Also see Master Response 2: Citizen-Initiated Smart Growth Plan, specifically the discussion under “Wetlands Impacts” related to fee calculation methods. Infrastructure has been planned and sized to accommodate the university. As each subdivision develops, appropriately sized infrastructure will be stubbed and sized to accommodate future university needs.

- 56-7 The comment states that the open space corridors proposed under the PRSP would not protect the biodiversity of the site and are inconsistent with the research behind the PCCP regarding effective reserves in Placer County. The comment further states that on-site habitat mitigation must be supported by scientific research and study. See Master Response 3: Placer County Conservation Program and Mitigation, which provides an overview of the PCCP, explains the current status, and provides additional details regarding the PCCP’s effectiveness as a mitigation tool and the Draft EIR’s mitigation approach.

The Draft EIR does not claim that PRSP Open Space Preserves would preserve vernal pool complexes or grasslands and does not propose them as PCCP reserves. Only the existing conservation reserves and adjacent proposed reserve acquisition areas in the northern portion of the SAP area are considered as PCCP reserves. The PRSP Open Space Reserves are designed to preserve riverine/riparian complex land cover, or stream system habitat consistent with SAP Policies NR-1.2, NR-3.4, and NR-4.1. Mitigation is proposed to compensate for the loss of vernal pool complexes and annual grassland either through participation in the PCCP or Mitigation Measures 4.4-1a, 4.4-3b, and 4.4-5a. Per the comment, “introduction of so much as a telephone pole” would displace all grassland birds; therefore, using this rationale, the CISGP would displace these species in a similar fashion as the project. The Draft EIR does not suggest that the project would maintain grassland habitat in the PRSP area and that is why compensatory mitigation is necessary. See also Master Response 2: Citizen-Initiated Smart Growth Plan.

- 56-8 The comment states that the PRSP does not provide the necessary level of detail for evaluation or corroboration of the effectiveness of the open space drainage plan. The comment further states that the General Plan stream setbacks are too small for vernal pool systems, and a surface and sub-surface watershed analysis is necessary.

Under the PCCP’s definition of a Stream System, the segment of stream within the PRSP area would be defined by its stream channel and a 50-foot setback on both streambanks from the stream’s ordinary high water mark. Any covered activity that impacts this Stream System requires authorization under the CARP, which is an element of the PCCP. If avoidance of the Stream System cannot be achieved, the direct and indirect impacts of a covered activity trigger a base land cover fee and the Stream System fee that takes into consideration the affected habitat types. Further, the activity is subject to notification under California Fish and Game Code Section 1602 (Streambed Alteration).

Vernal pool constituent habitat is defined by the PCCP as the vernal pool and its immediate watershed—an area encompassing the pool and extending outward from the wetted perimeter of the pool to a distance of 250 feet. Under the PCCP, any determination that the immediate watershed is smaller than the 250-foot perimeter must be supported by an analysis conducted by a qualified professional and approved by the reviewing Permittee in consultation with the Placer Conservation Authority (the PCCP’s Joint Powers Authority). Given that the PCCP framework addresses impacts to streams and vernal pools on a regional scale, with PCCP approval, an individual project would not require a surface and sub-surface watershed analysis, nor would the 2005 Setback Recommendations to Conserve Riparian Areas and Streams in Western Placer County apply.

For a discussion of mitigation that would be required if the PCCP is not approved, see Master Response 3: Placer County Conservation Program and Mitigation.

56-9 The comment states that a fiscal analysis has not been completed and that it must be completed and made available as part of the CEQA process. This is incorrect. CEQA requires lead agencies to consider the environmental impacts resulting from proposed projects; it does not require lead agencies to consider social or economic impacts, except to the extent that those impacts cause adverse effects to the environment. Therefore, CEQA does not require a fiscal analysis to be prepared. However, a market study was prepared by EPS for the PRSP and SAP and was available for public review on the County's website at the time the Draft EIR was released. Service impacts are analyzed and noted in Section 4.13, "Public Services," of the Draft EIR. A finance plan has been prepared for the PRSP and will be released to the public and available for the Board of Supervisor's consideration.

56-10 The comment suggests that the PRSP is inconsistent with its stated objective to foster sustainable community design. As noted in the Section 1 of the PRSP, the objective states that the project would incorporate design and construction measures that reduce energy usage, conserve water, incorporate water efficient landscaping, treat stormwater, and reduce automobile reliance. The PRSP's Utilities plan (Section 9) and Design Guidelines (Sections 2 and 6) include various requirements for future development in the PRSP area, which collectively address this objective. Through implementation of the PRSP, future development projects would be required to: (1) reduce water usage through measures such as turf reduction and recirculating hot water systems; (2) install landscaping that complies with Placer County's adopted Model Water Efficient Landscape Ordinance in order to reduce water use; (3) manage stormwater by including source control measures, site design measures, and hydromodification treatment features to reduce pollutants in stormwater and to reduce the quantity of runoff from a developed site; and (4) incorporate a mixed-use Town Center district with high-intensity non-residential uses and high-density residential uses in order to reduce automobile reliance by siting residential, employment, and service uses within walkable proximity to one another. As designed, the PRSP includes design features and implementation mechanisms that achieve its objective regarding sustainable community design.

Regarding the suggestion that the CISGP be reviewed for comparison, 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 for several reasons including especially lack of market support for the high-density products and constraints associated with developing a university on existing, privately-owned-and-operated industrial development. The master response also describes that CISGP 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.

56-11 The comment asserts that the PRSP would not reduce automobile dependence and that the proposed densities in the PRSP area would not be sufficient to support bus rapid transit. The comment requests that a study demonstrate that the PRSP would support transit, walking, and biking. The Draft EIR and the proposed project acknowledge that a planned BRT route would provide service through the PRSP area and western Placer County. Policy TM-3.1 in the SAP commits the County to update its Long Range Transit Master Plan to include transit service to the SAP area and identify funding to establish and operate this service. Mitigation Measures 4.14-13a commits the County to preparing a transit master plan for the net SAP and PRSP areas (i.e., a study to demonstrate how transit service would be provided in the PRSP).

56-12 The comment suggests that the PRSP is inconsistent with its stated objective to enable Blueprint consistency, per SACOG's vision. This issue is discussed in detail in Master Response 2: Citizen-Initiated Smart Growth Plan.

56-13 The comment indicates that there are six areas where the numbers listed in Table 6-1 in the Draft EIR are inconsistent with the numbers in the draft SAP and PRSP documents. A response to each of these six areas are provided below:

1. The comment notes that Table 6-1 in the Draft EIR assumes no multi-family residential development in the net SAP. This omission was made in error. See response to comment 31-10 for the corrected table.
2. The comment points out a discrepancy related to the total unit count for the project where 8,094 is referenced in one area of the Draft EIR and 8,096 is noted in another. The total unit count is 8,094 dwelling units. Table 6-1 has been revised as shown in Chapter 2, "Revisions to the Draft EIR."
3. The comment states that the PRSP and SAP do not disclose the breakdown of Retail, Office, Industrial, Innovation Center/R&D, and EMU uses within the Campus Park and SAP. Both the SAP and the PRSP include a land use summary and the associated development potential and intensity of each use. However, the SAP and the PRSP provide this information in a different manner. The SAP is an Area Plan or Community Plan and a component of the County General Plan, and as such, expresses land use development potential in terms of floor area ratio (FAR). The PRSP is a Specific Plan, and as an implementing mechanism of the County General Plan, it includes greater specificity regarding the allocation of planned residential units and non-residential square footage to Specific Plan parcels. While the PRSP's land use development potential is expressed in terms of FAR, it also provides parcel-specific development assumptions that align with each land use's FAR range. Due to the differences in the purpose and requirements of each plan, the SAP's development potential is necessarily more general than that of the PRSP.

The SAP's buildout information contained in the EIR provides a reasonably-anticipated, high-level assumption of each land use's buildout potential, which is consistent with the SAP's allowable FAR range. The PRSP's buildout information contained in the EIR also provides a reasonably-anticipated, high-level assumption of each land use's buildout potential, but with greater specificity, which is appropriate for a specific plan project. Table 4-2 of the PRSP provides a parcel-specific breakdown of the square footage assumptions that can be accommodated on each of the PRSP's General Commercial (GC), Commercial Mixed Use (CMU), and Campus Park (CP) parcels. For each of these land use designations, the PRSP's Land Use section also describes the mix of uses that each designation can accommodate, including the total square footage at an assumed FAR. Furthermore, the PRSP's Community Employment section provides a specific breakdown of the square footage that can be supported in the Campus Park land use, which allows for a mixture of Professional Office, Research & Development, Commercial, Light Industrial, and Warehouse uses, including an estimate for each. The square footages listed in the PRSP align with those listed in Table 6-1 of the Draft EIR.

4. The comment states that the accuracy of the values in Table 6-1 is unlikely but does not specify what values are being referred to and is unclear. 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.
5. The comment states that the PRSP provides 43 acres of Public Facilities, not 10.3 acres as listed in Table 6-1 of the Draft EIR. Table 4-1 in the PRSP distinguishes between public facility sites for County-related project features (totaling 10.3 acres) and those for schools (totaling 32.7 acres). The PRSP includes eight sites for County public facilities - 10.3 total acres for water storage tanks, pump stations electric facilities, etc. The PRSP also identifies sites for two schools, which total 32.7 acres. The Public Facilities line item in Table 6-1 of the Draft EIR does not include school sites, only County public facilities. This distinction in the Draft EIR is intentional. These are two types of public facilities, which constitute different uses of land, which are evaluated

individually by the Draft EIR. Because both the PRSP document and the Draft EIR recognize that the PRSP includes 10.3 total acres for County public facilities, the PRSP and Draft EIR are consistent with one another in each document's representation public facilities.

6. The comment states that the amount of parks/open space and preserve/mitigation areas listed in the Draft EIR does not align with the PRSP. For these types of features in the PRSP, the land use designations include Parks & Recreation (PR) and Open Space (OS). The PRSP's land use section indicates that the PR designation is for the development of active parks and that the OS designation accommodates both paseos and preserves. The SAP also includes land use designations for parks and open space features, and while the function of each land use is similar to the PRSP, although the title of each designation is slightly different. The Draft EIR, in its evaluation of both the PRSP and the SAP, combines similar land uses into single line items in its summary tables. This means that the title of each land use designation is slightly different, but the function of each land use is similar. Table 4-1 in the PRSP states that 69.8 acres of PR and 264.8 acres of OS are provided in the PRSP. Table 6-1 in the EIR states that 69.8 acres of Parks/Open Space and 264.8 acres of Preserve/Mitigation are provided in the PRSP. While the EIR uses, for purposes of equivalent comparison, a slightly different vernacular to describe each park and open space land use designation, the acreage numbers identified in the Draft EIR are consistent with the equivalent land use designations listed in the PRSP and SAP.

56-14 The comment raises environmental issues, but only in the context of the costs to mitigate those impact and the effects of those costs on financial viability of the university portion of the project, as well as public disclosure of those costs. The comment states the EIR does not evaluate the university location. The university is included as part of the Project Description and its associated impacts are analyzed throughout the Draft EIR as part of the PRSP, but at a programmatic level. See Master Response 7: Program- vs. Project-Level Analysis. See responses to comments 56-6 and 56-9, above, regarding analysis of fiscal impacts.

56-15 The comment indicates that an "onsite vernal pool study" must be prepared for the PRSP and that addressing the impact "parcel by parcel" after the subdivision would be considered piecemealing the analysis. The comment offers an additional vernal pool study to consider. As described in the "Methods and Approach" discussion in Section 4.4 of the Draft EIR, "Biological Resources," the analysis of impacts associated with the PRSP included project level mapping of habitat types and aquatic resources delineation completed according to USACE methodologies, which was verified and concurred by USACE on March 25, 2015. Because an on-site wetland delineation has been performed for the PRSP and has been verified and concurred by the USACE, no further vernal pool study is required. It should be noted that the USACE's concurrence occurred in 2015, which is more recent than the 2014 study identified by the commenter.

56-16 The comment asserts that Placer Parkway has not secured funding for construction and has not completed its environmental review. The comment asserts that it is not a feasible mitigation measure for these reasons and suggests a back-up plan be identified. The Draft EIR analysis considers the project's impact on traffic operations using the existing roadway network, which does not include Placer Parkway, in Impacts 4.14-1 through 4.14-12. Therefore, the Draft EIR already discloses the impacts of the project without Placer Parkway in place.

As described on page 4.14-50 of the Draft EIR, the County is in the final design stage for Phase I of Placer Parkway, which was analyzed independently by Placer County Department of Public Works and has received both NEPA and CEQA clearance. As described on page 4.14-50 of the Draft EIR, project proponents in the PRSP area would pay the applicable Tier II Placer Parkway fees, while development in both the PRSP and net SAP areas would pay the applicable SPRTA fees. These fees combined with fees collected from development in other growth areas subject to the Tier II and SPRTA fees would provide partial funding for Placer Parkway. Placer Parkway is also included in the SACOG 2036 MTP/SCS financially constrained project list. Therefore, it is considered a reasonably foreseeable project, and is suitable to include in the mitigation analysis.

56-17 The comment suggests that development within the net SAP and PRSP areas would include broadscale site preparation and soil stabilization for entire parcels, including those identified for retention as natural areas, ultimately affecting groundwater recharge rates and water movement in the soil profile. As discussed in Section 4.9.4 of the Draft EIR, the SAP goals and policies include many standards for preservation of natural areas and open space: Policy NR-1.2 requires the protection and enhancement of certain natural areas including stream corridors and valley oak woodlands; Policy NR-1.3 requires that the County permanently protect as open space areas of natural resource values including wetlands, riparian corridors, woodlands, and floodplains; Policy NR-3.2 requires that stream corridors be preserved in open, natural condition; and Policy PFS-5.1 requires that natural drainage systems be identified at the earliest stages of planning. These strong protections for natural areas would ensure that ground disturbance in these areas is avoided or minimized. Additionally, the type of site preparation described by the commenter would dramatically alter the natural community and would directly conflict with these policies. Because the natural stream corridors would remain intact, they would continue to serve as groundwater recharge areas even after the proposed development of the site.

The comment also suggests that the County evaluate the CISGP as an alternative. See Master Response 2: Citizen-Initiated Smart Growth Plan.

56-18 Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan.

**From:** Lorraine Marsh <lorraine@central-park-studio.com>  
**Sent:** Monday, February 18, 2019 5:33 PM  
**To:** Shirlee Herrington  
**Subject:** Sunset Industrial Area Site Plan

<b>Letter</b> <b>57</b>
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Dear Ms. Harrington,

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.

Respectfully,  
 Lorraine Marsh

57-1

<b>Letter</b> <b>57</b>	Lorraine Marsh February 18, 2019
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57-1 This comment letter is virtually the same as the content of comment letter 23. Therefore, this response simply cross-references to responses to this letter. See response to comment 23-1.

**From:** PAM & TOM MENCONI <tpmenconi@gmail.com>  
**Sent:** Tuesday, February 19, 2019 9:35 PM  
**To:** Shirlee Herrington  
**Subject:** No Project

<b>Letter 58</b>
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*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."*

*Respectfully*

*Pam & Tom Menconi*

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58-1

<b>Letter 58</b>	Pam and Tom Menconi February 19, 2019
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58-1 This comment letter is virtually the same as the content of comment letter 23. Therefore, this response simply cross-references to responses to this letter. See response to comment 23-1.

**Subject:** FW: Question about EIR  
**From:** Crystal Jacobsen  
**Sent:** Tuesday, January 29, 2019 9:21 AM  
**To:** [lorettakmoreno@yahoo.com](mailto:lorettakmoreno@yahoo.com)  
**Cc:** Shirlee Herrington; Leigh Chavez  
**Subject:** RE: Question about EIR

Letter  
59

Hi Loretta,

Thanks for your email. The Draft EIR is set up so that the PCCP is an option for mitigation; it was done this way because the PCCP is not yet adopted. So if PCCP adopted, then the project may mitigate thru the PCCP, and if the PCCP is not adopted, the Draft EIR also identifies traditional mitigation practices that would be implemented.

Thanks,  
Crystal

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**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](mailto:cjacobse@placer.ca.gov)



**From:** [lorettakmoreno@yahoo.com](mailto:lorettakmoreno@yahoo.com) [<mailto:lorettakmoreno@yahoo.com>]  
**Sent:** Tuesday, January 29, 2019 8:22 AM  
**To:** Crystal Jacobsen <[CJacobse@placer.ca.gov](mailto:CJacobse@placer.ca.gov)>  
**Subject:** Question about EIR

Dear Crystal,

I am writing regarding the Sunset Area Plan and Placer Ranch Specific Plan EIR. I called you yesterday but I thought it was better to write.

My question is, given that the PCCP is not yet approved and adopted, how can mitigation measures in the EIR suggest they will use the PCCP? As I know you are aware CEQA does not allow the promise of future action associated with mitigation measures that are currently not feasible because the PCCP does not officially exist. I ask you now because I'm sure there is some explanation for this.

59-1

Thank you for letting me know as soon as possible,

Loretta

**Letter** | Loretta Moreno  
**59** | January 29, 2019

59-1 The comment suggests that mitigation measures related to the PCCP to mitigate biological impacts is not feasible because the PCCP is not an adopted County document. The Draft EIR identifies two mitigation options for mitigating biological impacts in Section 4.4, "Biological Resources." As noted in Mitigation Measures 4.4-1a, 4.4-3b, 4.4-4a, 4.4-5a, 4.4-6a, 4.4-7a, and 4.4-8b, the project can mitigate through the PCCP, if adopted, or it can mitigate through traditional biological impact mitigation practices if the PCCP is not adopted. See Master Response 3: Placer County Conservation Program and Mitigation for a detailed discussion.

February 21, 2019

Letter  
60

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

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

Dear Ms. Herrington:

This comment letter seeks to address the Sunset Area Plan/Placer Ranch Specific Plan (Project) and its associated Draft Environmental Impact Report (DEIR). My comments are intended to ensure that any development in the Sunset Area provides maximal protection of the site’s unique environmental resources, including extensive vernal pool and riparian habitat, and addresses the existing community’s needs and concerns. This development’s impacts will remain for centuries to come, and development should be done with the utmost care, rather than business-as-usual development most reflective of the abysmal, congested, sprawling LA style of development where no one benefits.

The proposed project and currently proposed alternatives fail to comply with the requirements of the California Environmental Quality Act (“CEQA”), Public Resources Code section 21000 et seq. The DEIR violates CEQA because it fails to identify an alternative that would substantially reduce or eliminate even one of the Project’s significant and unavoidable impacts. Significant health, safety and quality of life impacts to the public will occur as a result of poorly planned development including the proposal to locate residential development proximate to the landfill, and significant congestion to local and regional roadways. The jobs-housing imbalance will be exacerbated given the existing housing crisis which was not adequately mitigated for. Further, flora and fauna species receive little to no relief under a development scenario and associated mitigation measures that do not do enough to minimize and avoid impacts (e.g. to wetlands and native species). CEQA requires environmental impacts be avoided and minimized where feasible.

60-1

There are countless alternative ways that the County and developer can meet their development goals and objectives while reducing the environmental toll/footprint on the landscape. The Alliance for Environmental Leadership (AEL) has engaged with the

Page 1 of 2  
Moreno Comment Letter  
Sunset Area Plan/Placer Ranch Specific Plan DEIR  
State Clearinghouse No. 2016112012

community to produce a Citizen-Initiated Smart Growth Plan<sup>1</sup> that fundamentally reimagines future development for the area. Given the alternatives the County put forth fail to adequately avoid and reduce environmental impacts across impact areas, CEQA requires that the County evaluate this proposed alternative in a revised and recirculated DEIR.

Once again, the County fails to adequately provide alternatives to the proposed project, and fails to adequately minimize impacts. Especially in the case of biological resources. When avoidance of impacts is possible, the County should absolutely require the developer to redesign to ensure the very best development outcomes for Placer County. Mitigating offsite for onsite impacts should only be done when there are no alternatives onsite.

Placer County should be a county that wins all around, not just benefitting the few. Short-sighted development plans, cookie-cutter development with no thought given to drawing from and working with the natural environment onsite, should not be the future of Placer County. Simply drive down towards the Bay Area, or Los Angeles, and you see short-sighted, anywhere-America development that benefits no one in the long run. Please do better Placer County. We can have it all with better design (AEL's proposed alternative).

Thank you for your consideration.

Sincerely,

Lorie Moreno  
541-786-0330

60-1  
cont.

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<sup>1</sup> The Smart Growth Plan was submitted under separate cover from AEL, but is incorporated by reference into this comment letter.

Page 2 of 2

Moreno Comment Letter  
Sunset Area Plan/Placer Ranch Specific Plan DEIR  
State Clearinghouse No. 2016112012

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<b>Letter</b> <b>60</b>	Lorie Moreno February 21, 2019
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- 60-1 The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIR. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

The comment also states the Draft EIR violates CEQA because it does not include an alternative that would reduce the project's significant and unavoidable impacts. See Master Response 1: Alternatives Analysis. For the reasons described in that master response, the Draft EIR includes a reasonable range of alternatives, and the alternatives analysis is adequate.

The comment expresses concern about the project's significant impacts in the areas of health and safety, quality of life, traffic congestion, jobs-housing balance, and biological resources. These issues are addressed in their respective sections of the Draft EIR. No specific issues related to the adequacy of the content, analysis, or conclusions in the Draft EIR are raised in this comment. Regarding CEQA requirements for mitigation measures, see response to comment 54-1.

Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, 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. Also see Master Response 8: Recirculation.

Finally, the comment states that the Draft EIR does not adequately minimize impacts, especially for biological resources. Section 4.4, "Biological Resources," of the Draft EIR describes the project's potential impacts related to biological resources and identifies mitigation measures to reduce significant and potentially significant impacts. Where mitigation is unavailable or available but unable to reduce impacts to below the thresholds of significance, impacts are determined to be significant and unavoidable. The comment does not provide reasons specifying why the mitigation measures for biological resources are inadequate. Therefore, a response is not warranted.

February 14, 2019  
Placer County Planning Commission  
Sunset Area DEIR review

Letter  
61

Technical flaws and deficiencies

4.10-8

Policy 4.G.11

“When considering land use changes in the vicinity of a landfill operation, the County shall consider the landfill as the DOMINANT LAND USE IN THE AREA. In order to PROTECT THESE FACILITIES from INCOMPATIBLE encroachment, new residential land uses shall be separated from the property lines of active and future landfill sites by a buffer of ONE MILE.”

61-1

4.10-14

“Amendment to reduce buffer from 5,280 feet to 2,000 feet for residential development with the possibility of allowance within 1,000 feet. Resulting in land use INCOMPATIBILITY due to residential development occurring closer to the facility. It is expected that new residents and users within the project area would complain about odor from the landfill and that the number of complaints lodged about nuisance odors would increase. Such complaints could create pressure for the landfill to implement additional odor control and reduction measures at the facility and absent measures to control odors at the source could interfere with the ability of the landfill to expand or modify needed operations. Impacts relative to consistency and COMPATIBILITY of the proposed land uses with the landfill would be POTENTIALLY SIGNIFICANT.”

61-2

4.10-15

“Placer County Air Pollution Control District Handbook recommends a one mile buffer around the landfill. The stated purpose of this buffer is to protect the landfill from INCOMPATIBLE encroachment .”

“The landfill is an important and valuable County asset with substantial capacity and permitted to provide many more years of permitted service, the intent of the buffer and other landfill related policies in the General Plan was to separate potentially INCOMPATIBLE uses, protect the landfill, and protect new uses from nuisances. Residential encroachment could create pressures on the landfill

61-3

operations, resulting in the need to entertain other solutions: diverting waste to another facility, which could be costly and could result in environmental impacts; or siting a new landfill, which would likely be infeasible given cost, timing, and regulatory considerations. Complaints directed at the landfill have been received from residents more than 2 miles away, primarily about odors.”

61-3  
cont.

“It is likely that residential development ANYWHERE in the Placer Ranch Specific Plan area would be subject to odor from the landfill. Some or many future residents and users could find the odor objectionable. If the less restrictive buffer amendment is implemented with residential development closer to the landfill, it would result in an INCOMPATIBLE use with the landfill.”

4.10-16

“Odor complaints about the landfill could result in enforcement action and/or implementation of additional odor controls.”

Comparing other landfills to the one in Placer County is meaningless. Every landfill has conditions that are unique. Terrain and atmospheric conditions play a large role in the impact to uses surrounding a landfill.

61-4

This is not theoretical, we know that even with a mile buffer there are notable complaints.

4.10-17

“Based on the examples it was determined that it is likely that increased development in the vicinity of the landfill will result in an increase in odor complaints which could lead to pressure for the landfill to implement additional odor control measures.”

Enclosing compost operations, counter to what was stated, would be sizable and extremely expensive. The resulting of doing this would not insure that all odors from the operation would be contained.

61-5

Transporting waste to another facility would be very costly. Finding an alternative isolated, non-controversial, location within the County to process material or green waste would be nearly impossible.

So called odor neutralizing misters do not eliminate odors, only cover them up. Is a heavy perfume smell of maybe lavender a good alternative. Effectiveness is questionable.

No compensation from the developer or the County has been offered, so any costs related to minimizing the impact of the landfill on nearby properties would have to be absorbed by the ratepayers, which constitutes a large segment of the Placer County population.

Again, it was stated that "Impacts relative to consistency and COMPATIBILITY of proposed land uses with the landfill would be POTENTIALLY SIGNIFICANT.

61-5  
cont.

4.10-18

Where have building design, landscaping design, and deed notification proven to truly lessen the complaints related to a landfill, especially odor impacts?

"These measures would not eliminate the source of the odor or any of the factors that contribute to intensification or range of perception of odor depending on circumstances, such as wind, temperature inversions, specific operating methods, and amount/type of waste. Therefore this impact would be SIGNIFICANT AND UNAVOIDABLE.

61-6

4.3-6

Need to specify that the reference to "alternative daily cover" and more particularly "sludge" is sewage waste from the nearby Lincoln Wastewater plant. It is used to help facilitate the breakdown of waste material in the landfill. The sewage waste was noted as a high contributor in the detection of offensive odors coming from the landfill.

I counted eight times were "incompatibility/incompatible/questioning compatibility" were mentioned in relationship to landfill operations and residential development. Seems like a clear signal that this project as currently presented is not wise and would have wide ranging negative implications to the residents of Placer County.

61-7

We are trying to force the preverbal square peg into a round whole. This plan needs to accommodate the landfill rather than the landfill accommodating the plan.

I believe the real test of whether this plan is based on reasonable acceptable facts is whether the developer, or those that prepared the report, or any of you in this room would want to live or have any of your family members live in this community? If you are being truly honest, I think the answer would be "no".

<b>Letter 61</b>	Wayne Nader February 14, 2019
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- 61-1 This comment reproduces, with added capitalization, text from Draft EIR page 4.10-8 that quotes Placer County General Plan Policy 4.G.11. Although this comment is under a header of “technical flaws and deficiencies,” the commenter has not provided a comment to explain what he or she feels is a flaw or deficient; therefore, no response can be provided other than that the Draft EIR evaluated impacts associated with incompatibility in Section 4.10, “Land Use.”
- 61-2 Although this comment is in quotation marks, it does not appear to be a direct quotation from the Draft EIR. The comment appears to restate, with some differences and added capitalization, the summary text for Impact 4.10-2. Although this comment is under a header of “technical flaws and deficiencies,” the commenter has not provided a comment to explain what he or she feels is a flaw or deficient; therefore, no response can be provided.
- 61-3 Although this comment is in quotation marks, it does not appear to be a direct quotation from the Draft EIR. The comment appears to restate, with some differences and added capitalization, text found on Draft EIR page 4.10-15. Although this comment is under a header of “technical flaws and deficiencies,” the commenter has not provided a comment to explain what he or she feels is a flaw or deficient; therefore, no response can be provided.
- 61-4 Although this comment is in quotation marks, it does not appear to be a direct quotation from the Draft EIR. The comment appears to restate, with some differences, text found on Draft EIR page 4.10-16. The commenter’s opinion that comparing other landfills to the WRSL is meaningless is noted and will be considered by decision makers. It is true that terrain and atmospheric conditions affect where odor can be detected in relation to its source; however, the comparison to other landfills is not intended to suggest how odors would be perceived at the WRSL. Rather, the Draft EIR uses this comparison to discuss the potential range of outcomes that could occur at WRSL if odor complaints directed at the WRSL result in enforcement actions and/or other odor controls. As stated in the Draft EIR on page 4.10-16,

Several examples of landfills subject to odor complaints and their outcomes are provided below. Note that these examples are not exhaustive diaries of all odor complaints, legal complaints, settlements, orders, and violations at these facilities, nor are they necessarily reflective of current conditions at each facility or indicative of what is occurring at the WRSL. Rather, these examples are intended to provide a representative sample of some of the results of odor complaints at a range of locations within California.

The County believes that this analysis of outcomes at a variety of facilities across the state is adequate to determine some possible outcomes at the WRSL if enforcement actions and/or other odor controls are implemented at the WRSL.

Regarding the comment’s claim that “there are notable complaints” under current conditions, the Draft EIR discusses current odor complaints on pages 4.3-7 through 4.3-11.

- 61-5 Although parts of this comment are in quotation marks, it does not appear to be a direct quotation from the Draft EIR. The comment appears to restate, with some differences and added capitalization, text found on Draft EIR page 4.10-17.

Contrary to the comment’s representation, the Draft EIR does not state that enclosing compost operations would be inexpensive or minor. Indeed, the SCS Engineers Report in Appendix J of the Draft EIR notes that enclosure of composting operations is more expensive than windrow or aerated static pile composting operations and that enclosing operations would require substantial modifications. The Draft EIR, contrary to the comment’s claim, states on page 4.10-17 that enclosing

compost “could require minor *construction* (e.g., for an enclosure) and would require a change to activities within the WRSL property and likely would not result in substantial additional environmental impacts” (emphasis added). This Draft EIR statement is still correct, because the construction would take place within the existing confines of WRSL parcels and construction would be minor in the context of SAP buildout. See also Master Response 4: Odors for a discussion of revisions to this portion of the Draft EIR.

The commenter’s opinion that enclosing composting operations would not ensure that odors would be contained is noted; however, it should also be noted that the Draft EIR does not claim that an enclosure would prevent all odors from the composting operations. Rather, page 4.10-17 of the Draft EIR lists several changes to composting operations, including an enclosure and applying finished compost to active compost, as some methods that could “reduc[e] odor intensity.” In addition, making changes to composting operations is just one of “a range of potential odor control measures” discussed in the Draft EIR. See also Master Response 4: Odors for a discussion of revisions to this portion of the Draft EIR.

The Draft EIR on page 4.10-17 lists diversion of waste to another facility as one of “a range of potential odor control measures,” but it does not specify that the facility would need to be in the county and it does not discuss the cost of the measure. Nonetheless, the commenter’s opinion is noted and included in the record for consideration by decisionmakers. See also Master Response 4: Odors for a discussion of revisions to this portion of the Draft EIR.

The Draft EIR on page 4.10-17 lists odor-neutralizing misters as one of “a range of potential odor control measures.” Regarding the comment’s statement that the effectiveness of odor neutralizers is questionable, the Draft EIR notes on page 4.10-17 that “[t]he WPMWMA is conducting a pilot study to assess the value of odor neutralizers.” The SCS Engineers report in Appendix J of the Draft EIR states that “odor-reducing misters are best applied as a last line of defense against odor impacts because their impact can be unreliable if misapplied. Target use of odor-reducing misters, such as at the MRF, is expected to be more reliably effective.” The comment’s suggestion of a heavy perfume smell or lavender is noted and will be considered by the decision makers.

- 61-6 Although a part of this comment is in quotation marks, it does not appear to be a direct quotation from the Draft EIR. The comment appears to restate, with some differences and added capitalization, text found on Draft EIR page 4.10-18.

Landscaping design, such as windbreaks, can reduce odor. Windbreaks can deflect an odor plume upward. Building design can control how odor enters a building by, for example, facing windows in a certain direction compared to wind direction. Deed notification does not reduce odors, but it could help with the sensitivity of the receptor group by allowing potential future residents who may be particularly sensitive to odors to look for housing elsewhere. However, consistent with the conclusion of Impact 4.10-2, even with implementation of these measures, the impact would be significant and unavoidable.

- 61-7 The comment states that the Draft EIR should reference that “alternative daily cover,” or more particularly “sludge,” is sewage waste from the nearby wastewater treatment plant and that it is a high contributor in the detection of offensive odors coming from the landfill. Draft EIR Appendix J notes that “[w]astewater sludge from the Roseville wastewater treatment plant (WWTP) is also a significant source of odor.” In the recommendations, it is again noted that this sludge results in odors. The study also notes that fines are derived from municipal solid waste and the materials recovery facility, and those are used as alternative daily cover. No revisions have been made to the Draft EIR.

Also, see Master Response 4: Odors. The remainder of this comment expresses an opinion about the merits of the project and does not raise an environmental issue. These comments are noted and will be included in the record for consideration by decision makers.

**From:** Peggy Peterson <peggyjust@yahoo.com>  
**Sent:** Sunday, January 13, 2019 5:23 PM  
**To:** Shirlee Herrington; ejevaldi@placer.ca.gov; Christopher Schmidt; Crystal Jacobsen; Kally Keding-Cecil  
**Subject:** Request for comment deadline extension

<b>Letter 62</b>
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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 DEIRs recently released.

Comments for WHI and II are due by 5:00 pm 1/14. This is a 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 totaling 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 DEIRs 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 EIRs 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, and as such, we the public are being denied access to critical information that would allow for pertinent and accurate statements.

62-1

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 date for review should be extended to afford the community its guaranteed right to comment.

Thank you in advance for your consideration of my request,

Peggy Just Peterson  
 Granite Bay, CA

<b>Letter 62</b>	Peggy Just Peterson January 13, 2019
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62-1 This comment letter is virtually the same as the content of comment letter 32. Therefore, this response simply cross-references to responses to this letter. See responses to comments 32-1 through 32-3.

February 16, 2019

Letter  
63

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

**Dear Ms. Herrington and Chair and Members of the Placer County Planning Commission:**

I have reviewed Placer County’s Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan (SAP) and the Placer Ranch Specific Plan (PRSP). I am submitting the following comments, questions and concerns that I wish to be included in the public comments and addressed by the County.

**4.2.1 Conversion of Farmland**

This project would convert many acres of agricultural land to non-agricultural uses. The amount of acreage is of great concern to me for many reasons. The Placer County General Plan and the Placer Legacy Open Space and Agricultural Conservation Program have goals and policies that favor preservation of farm lands and minimize impacts to them. This DEIR seems in direct opposition to those goals and objectives, as this plan would eliminate 6% of the remaining farm land in the County. This is a loss to the county both economically and ecologically, but that isn’t addressed in the DEIR. Where is that information? Surely there is a benefit that these lands provide as they are.

Farmland not only provides income and commodities, it helps in many other ways that would lessen the impacts of this project if that land is left in agricultural designation. While agricultural land does not provide the diversity and quality of habitat that designated preserve land does, it does offer needed foraging space for many different birds, including many of the species which are noted in the DEIR as being species of concern. The open land left in this general area supports one of the highest populations of wintering hawks in California. Tricolored Blackbirds use agricultural land and are in the vicinity. Agricultural lands also provide much appreciated visual buffers and relief from the suburban sprawl and bring people a peaceful visual respite.

This DEIR needs to address the value of all the benefits that these lands offer.

**Mitigation measure 4.2-1a, 1b** would have land elsewhere purchased to mitigate this loss of farmland. This will still result in the net loss of farmland in the county. How can this be considered a mitigation measure if the end result is loss of farmland, while the County states in the General Plan a goal is to preserve farmland?

63-1

**4.5 Cultural Resources**

**4.5-1** In this section it is unclear if the TCR's are any of the previously recorded sites or isolated finds. Since the PRSP area received intensive pedestrian surveys, it seems that these areas would have been surveyed also. What is the correlation of the TCR's and the survey and the previously recorded sites and/or isolates?

63-2

**4.5-2** The net SAR area needs to have a current archaeological pedestrian survey that will relocate the known and recorded sites. These sites and any other sites discovered must be evaluated for significance.

**4.4-1 Biological Resources – Analysis, Impacts and Mitigation**

The whole premise of the mitigation measures relies on the PCCP. The PCCP is not even in existence. Nothing has been approved or put into the county documents for this plan. How can this DEIR even be considered when many mitigation measures throughout the document refer to and depend upon a non-existent program? That being said as my overarching complaint with this DEIR, my specific comments continue.

Removing natural vernal pool habitat is not acceptable. There are special status species of plants and animals associated with the vernal pool habitat and there is no way to compensate for the loss of this unique habitat. Habitat creation is not a substitute for naturally occurring vernal pools. Vernal pools have a long history – thousands to millions of years in the making under unique conditions. That history is in the soils, topography, and genetics of the entire community of adapted species associated with that habitat. Many members of this community, especially the microorganisms involved, are still poorly known and understood. No constructed recreation can have that history. While there may be some success in getting certain parts of the ecological community established in constructed vernal pools, their long-term viability is not assured without the presence of the entire community and the conditions in which it can flourish. The mitigation areas seen from Athens Road where vernal pools have been constructed look nothing like the naturally occurring vernal pool areas. Pools do not naturally occur as regularly exact in size, spacing, or shape as these are. If all or most of the SAP area in the Reserve designation are constructed pools, then we are accepting those poor substitutes as the new reality of vernal pools, and losing the real, irreplaceable thing.

63-3

**4.4.1 Regulatory Setting**

The vernal pool recovery section mentions the Western Placer County core area. How does that area overlay on the SAP/PRSP area? A map is needed to supply that information. Since the goal of that plan is to retain 85% of remaining vernal pool fairy shrimp habitat in that core area, we need to know where that area is located. Why can this proposed plan be considered if it doesn't comply with the County's plan for vernal pools?

**4.4.5-a Mitigation for special status animals**

These measures again rely on the PCCP, a plan that does not exist as a County approved plan. There would be a considerable amount of land involved that would result in the loss of substantial habitat for numerous species. Once removed it is a net loss in the county and

the state. Buying mitigation credits does nothing for the net loss of habitat. These species of concern are getting pushed out in every direction. Do not further stress their populations. Do not further interrupt their corridors for movement.

63-3  
cont.

**4.3.6 Objectionable Odors**

A look at the odor complaint and notification history map in 4.3-6 shows that the majority of complaints are from residences south of the landfill site and associated with the landfill. This is beyond the one-mile buffer zone currently in effect for residential development. The proposed PRSP seeks to reduce the buffer zone to 2000 feet. This will certainly dramatically increase the number of complaints. How will these complaints be handled? Since it would be a County initiated problem, it seems the County should be responsible.

The Western Placer Waste Management (WPWMA) provides a vital service to much of Placer County and it is the dominant feature of the area. This plan needs to acknowledge that feature and look for compatible development ideas for nearby land that respect the existing buffer zone exclusions for use. Residential development in the PRSP doesn't fit.

The only alternative of those proposed in the DEIR that would be acceptable is Alternative #1. – No project. The list of substantial impacts is too great. This DEIR has two aspects that seem to need addressing before any plan can be proposed for the SAP. First, the plan relies on the Pleasant Grove Retention Basin expansion before this area can be developed. That permission has not been obtained. Second, this plan relies heavily on the PCCP to solve many conservation issues. As stated previously, this plan is not an approved plan – only a concept. There is too much land involved that is subject to a high level of use that is not present there now. This proposed plan is a continuation of the plans of the 1990s that have gotten the surrounding areas into the urban sprawl situation they are in now – with attendant problems of bad traffic, no rapid transit, no natural habitat left, too many single-family homes, etc. What is needed is a clear vision for the future and this DEIR does not do this.

63-4

I do suggest a serious study of the Citizen Initiated Smart Growth Plan by all members of the Planning Commission. It provides a plan that carefully considers what is there now and a smart way to approach development in a much more compatible way with the land.

I do not appreciate or approve of the way this environmental document was produced. How is Placer County both the creator of the DEIR and the reviewer of it? Why is my tax money being used to create a specific plan document for the developer who will profit greatly by the project?

Sincerely,  
Gayle Russell  
A Placer County concerned resident of  
English Colony Way  
Penryn, CA

<b>Letter 63</b>	Gayle Russell February 16, 2019
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- 63-1 The comment expresses concern regarding the project's conversion of Farmland to a nonagricultural use. Loss of Farmland is addressed in the Draft EIR in Section 4.2, "Agricultural Resources," under Impact 4.2-1, conversion of farmland to a nonagricultural use; as described therein, this impact would be significant and unavoidable even after mitigation. Placer County General Plan policies related to agriculture and Placer Legacy Open Space and Agricultural Conservation Program objectives are described on pages 4.2-8 through 4.2-11 of the Draft EIR. Further, the Draft EIR describes that because the project would result in the conversion of almost 6 percent of Placer County's total Farmland, the project would also result in a significant cumulative impact associated with overall Farmland conversion in the region (see pages 4.2-17 and 4.2-18).

See response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts, which include specific requirements for public agencies to consider potentially significant adverse environmental effects of projects before taking action on those projects; avoid or mitigate, wherever feasible, the significant adverse environmental effects of projects it approves or implements; and, prepare findings and issue a "statement of overriding considerations" explaining why they believe, based on substantial evidence, those significant effects are acceptable. The County has complied with CEQA requirements by identifying the project's significant and unavoidable impacts in the Draft EIR. As part of the project approval process, the Placer County Planning Commission and Board of Supervisors will review and consider the EIR analysis as well as all comment letters submitted during the Draft EIR public review period and the written responses to those comments before a decision on the project is rendered.

Regarding the comment about economic and ecological loss to the County related to this Farmland conversion, see response to comment 71-21. Also, see Sections 4.4, "Biological Resources," and 4.1, "Aesthetics," of the Draft EIR, which address the habitat and visual benefits provided by the agricultural lands within the project site.

See responses to comments 12-11 and 52-24 regarding the project's Farmland conversion impact and accompanying mitigation measures. As described in the Draft EIR on pages 4.2-14 and 4.2-15,

Although the conservation easements identified for Mitigation Measures 4.2-1a and 4.2-1b could partially offset the direct conversion of Farmland in the project area, this approach would not create new Farmland to replace Farmland that would be lost, and no additional mitigation is feasible. Therefore, the impact would be **significant and unavoidable**.

Thus, the Draft EIR acknowledges the project's conversion of farmland to be a significant and unavoidable impact, even with mitigation.

- 63-2 The comment raises questions regarding tribal cultural resources (TCRs). As stated in the Draft EIR (page 4.5-23), although no specific TCRs have been identified through the AB 52 process, United Auburn Indian Community (UAIC) identified two locations in the PRSP area as being sensitive to potential TCRs. After the close of the AB 52 consultation process, the UAIC identified several additional features that they consider to be TCRs. These are identified with an asterisk in Table 4.5-1 of the Draft EIR. Table 4.5-1 also includes a brief description of these features, which answers the commenter's questions.

The comment also raises issues regarding the treatment of known and recorded archaeological sites and the need for pedestrian surveys in the SAP. These are addressed in the Draft EIR, which states (page 4.5-27) that SAP Policies CR-1.1, 1.5, 1.6, and 1.7 require the survey of areas with a moderate to high degree of sensitivity for cultural resources, the evaluation of archaeological resources for inclusion in the National Register of Historic Places and California Register of Historical Resources,

that discretionary development projects are designed to avoid potential impacts to significant cultural resources whenever possible, and requires the suspension of construction activities if and when cultural resources are discovered and the retention of qualified cultural resources specialist to assess the finds and develop measures for the protection, recordation, or removal of the cultural resources.

- 63-3 The comment states that the mitigation measures rely on the PCCP, which does not yet exist (is not yet approved or adopted) and that created vernal pools cannot substitute for naturally occurring vernal pools and their long-term viability is not assured.

The Draft EIR provides participation in the PCCP as an option for mitigating project impacts on biological resources covered under the PCCP should it be adopted and available by the time future projects are implemented. The Draft EIR does not rely solely on the PCCP for impact mitigation; there are optional mitigation measures and front-loaded policies and programs, presented under the heading “Proposed Sunset Area Plan Goals and Policies” beginning on page 4.4-31 of the Draft EIR, that mitigate the project’s potential impacts on biological resources in the event the PCCP, including the Western Placer CARP and associated USACE programmatic permits, are not adopted or are not available as a permitting and mitigation strategy for future projects. See also Master Response 3: Placer County Conservation Program and Mitigation.

The project does not propose creating vernal pools within the on-site Preserve/Mitigation Reserve or Open Space Preserves land use designations. As described under Mitigation Measure 4.4-1a, project proponents would be required to replace or restore on a “no-net-loss” basis the function of all wetlands and other waters that would be removed, lost, and/or substantially degraded as a result of implementing the respective project. Mitigation methods may consist of establishment of aquatic resources in upland habitats where they did not exist previously, reestablishment (restoration) of natural historic functions to a former aquatic resource, enhancement of an existing aquatic resource to heighten, intensify, or improve aquatic resource functions, or a combination thereof. The compensatory mitigation may be accomplished through purchase of credits from a USACE-approved mitigation bank, payment into a USACE-approved in-lieu fee fund, or through permittee-responsible on-site or off-site establishment, reestablishment, or enhancement, depending on availability of mitigation credits. Created or restored vernal pool habitats would be required to meet annual performance standards and final success criteria to demonstrate no net loss of function or corrective measures would be required.

The comment also asks how the Western Placer County core area overlays on the SAP area and requests a map providing that information. The comment also asks how the proposed plan can be considered if it does not comply with the County’s plan for vernal pools. The Western Placer County vernal pool recovery plan core area is shown with the SAP area overlay in Exhibit 4.4-4 of the Draft EIR. It is unclear to what the comment is referring as the “County’s plan for vernal pools.” The vernal pool recovery plan discussed in the comment is a USFWS plan for recovering federally listed vernal pool species; it is not the County’s plan. The vernal pool recovery plan is not regulatory in nature; however, it may be taken into consideration when analyzing potential impacts on vernal pools and associated biota. Consistency with the vernal pool recovery plan is not required by law.

- 63-4 The comment expresses concern about objectionable odors and the possibility of the project resulting in an increased number of odor complaints. See Draft EIR Impact 4.10-2 and Master Response 4: Odors for a discussion of the potential for the project to result in more odor complaints and what the potential effect of those odor complaints may be. Refer to them also for a discussion of responsibility for implementing odor control measures at the WRS.

The commenter’s opinion that the No-Project Alternative is the only acceptable alternative is noted and will be included in the project record for consideration by decision makers. Because this comment speaks to the merit of the project and does not raise a significant environmental issue, no additional response is necessary.

Regarding the comment that the County should study the CISGP, see Master Response 2: Citizen-Initiated Smart Growth Plan for a discussion of the CISGP.

The SAP is an area plan that provides the policy framework and zoning for the community. The County regularly updates and funds plan updates through the County's general fund. The Draft EIR explains the purpose of the SAP on page 1-1:

To renew and re-energize the vision for the Sunset Area, the County is proposing an update to the existing SIA Plan. The proposed updated plan, the Sunset Area Plan (SAP), is the policy document which, together with proposed development standards and design guidelines, will guide growth in the SAP boundaries for the 20-year planning horizon.

Preparation of the EIR is required under CEQA:

The County is the lead agency for consideration of this EIR and proposed project approval. CEQA requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects (PRC Section 21000 et seq.). CEQA also requires that each public agency avoid or mitigate to less-than-significant levels, wherever feasible, the significant adverse environmental effects of projects it approves or implements. If a project would result in significant and unavoidable environmental impacts (i.e., significant effects that cannot be feasibly mitigated to less-than-significant levels), the project can still be approved, but the lead agency decision makers, in this case the Placer County Board of Supervisors, must articulate and adopt findings and issue a "statement of overriding considerations" explaining in writing the specific economic, social, or other considerations that they believe, based on substantial evidence, make those significant effects acceptable (PRC Section 21002; State CEQA Guidelines Section 15093).

It should also be noted that the funding for the SAP/PRSP is split between the County (for the SAP) and the applicant for the PRSP (a private development project).

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

Letter  
64

Email: sherring@placer.ca.gov

Re: Sunset Area Plan/Placer Ranch Specific Plan DEIR Report - State Clearinghouse No. 2016112012, Vol. 1&2

In reviewing the December 2018 Draft Environmental Impact Report (DEIR) for the Sunset Area (SA) Plan and the Placer Ranch Specific Plan (PRSP) areas, I have a number of concerns. Re-view is in accordance with the California Environmental Quality Act (“CEQA”) and Public Resources Code, Section 21000, et seq. CEQA requires the County address and fully mitigate the effects of the plan upon public health and natural resources, etc. Placer County used Ascent Environmental company to gather data and methodology used in your Tables. However, upon review, the DEIR reveals over 60 significant and unavoidable impacts in almost every category. Negative impacts will impose serious consequences upon public health, air quality, housing, wildlife, and mobility in the proposed Placer Parkway transportation systems if this plan were to go forward as presented in the DEIR. (See Exhibit 1-2 Proposed PRSP Land Use Plan)

64-1

In addition, implementation of the project would require conversion/loss of Farmland (Prime, Farmland, Farmland of Statewide or Local Importance or Unique Farmland) to nonagricultural use. This project could result in the total conversion of over 7,295 acres, which would be a significant loss. Mitigation has been identified that requires an option for preservation of Farmland at a 1:1 ratio, or to mitigate in accordance with the PCCP at such time it is adopted, the mitigation would only partially offset the direct conversion of Farmland in the project area. This approach would not create new Farmland to replace Farmland that is lost, AND no additional mitigation is possible.

**Population/Employment/Residential Impacts in Specific Plan Areas:**

The DEIR, is a large draft document that will serve as a guide to growth of over 8,047 acres of land located in the western portions south Placer County. A specific plan, the Sunset Area (SA) Plan located within the City of Roseville and surrounding many existing neighborhoods where a future buildout of (yet undetermined) Sacramento State college campus is expected. The college campus combined with surrounding land uses projects an increase in student population of up to 30,000 students at buildout. A regional retail district is included in SA which is twice the size of the Galleria, Fountains, and adjacent box stores combined; and will compete with existing retail in Lincoln, Rocklin and Roseville. The inclusion of more retail will result in low paying wage jobs that will not support the costs of housing and accompanied lack of transit alternatives in this project will cause unwarranted vehicular congestion and negative impacts upon air quality. The DEIR offers no alternative transit opportunities for students and residents to ameliorate the negative and significant impacts of this project upon public health.

64-2

Housing alternatives are not fully mitigated in the DEIR. The location of SA area plan in Lincoln/Rocklin includes the addition of 5,636 low density housing units to be built within 1000 feet of Western Regional sanitation plant/Landfill facility with no adequate buffer from odor, nor mitigation to better the expected negative health consequences upon public. Landfill and Buffers: (See Land use 4.10.1) which allows residential development as close as 1000 feet and suspected odors will affect public health. According to the DEIR (Section 4.3-5), the Western Placer Waste Management Authority is actively engaged in yet incomplete studies concerning odors and mitigation of such the nature, and effectiveness of studies or strategies are as yet unknown, no quantifiable thresholds of significance for odor impacts is offered in the DEIR, and no existing fee program or other mechanisms is contemplated in order to fund the costs of odor mitigation in the DEIR. This impact would be significant upon the public health if not fully mitigated in the DEIR.

**Transportation and Traffic and Air Quality**

Placer Parkway (PP): A Multi-land expressway included in the plan offers no other transit alternative that reduces expected increase in CO2 emissions from increased vehicular traffic upon local project roadways. Such an increase in traffic will negatively affect air quality standards imposed by the California Air Resources Board (ARB) with no alternative transit mentioned in the DEIR. PP creates significant roadway construction and right of ways in the planning areas; noise, air quality are considered unavoidable and significant. Long-term emissions exceed maximum allowed under the ARB guidelines with no off-site mitigation plan and significant/unavoidable effects upon public health. Toxic air contaminants will exist within 500 feet of Hwy 65 which currently experiences up to 100,000 vehicle trips per day. Hwy 65 will be congested with at least 895,317 new daily vehicle trips per day (this does not include surrounding freeways I-80 and I-50 which will connect to the proposed Placer Parkway). Significant negative impacts need to be fully mitigated to avoid serious impacts of bad air quality upon Placer residents.

64-3

**Environment/Land**

The DEIR does not complete studies of the cumulative and undesirable impacts upon local species (reptiles, birds, migration, habitat, swainson hawk, etc.) no existing alternative no mitigation study fully addresses the effects upon the loss of 7,297 acres of farmland, species, fauna/flora, and vernal pools as per CEQA Guidelines section 15082(a) (1) will require specific mitigation studies not mentioned in the DEIR. The most significant effects are shown in Table 4.2-1 DEIR as farmland is proposed to be converted to non-ag use, a significant impact upon farmland production for the Placer/SACOG region.

64-4

**Water Quality:**

In the DEIR, under the SAP and the PRSP Plan, storm water runoff from Auburn Ravine and Pleasant Grove Creek, all nearby watersheds lack a strong CEQA analysis on the impacts of water runoff downstream, including viable mitigation and unavoidable significant impacts of adjacent areas (unincorporated) outside of the county boundaries. Therefore, the DEIR is not taking into consideration the effects of the combined watersheds which may have a significant negative impacts upon water runoff in our Placer communities upon full buildout of the project plan areas.

64-5

I ask that DEIR be revised to include alternative plans to mitigate significant and unavoidable impacts upon public health and the loss of over 7,297 acres of Farmland. I also request the County consider alternative plans for this project that induces quality land use, transit and smart growth for the project and surrounding areas should it go forward. Please consider the Citizen Initiated Smart Growth Plan created by the Alliance for Environmental Leadership. Please revise the DEIR and recirculate to the public for further review and consideration.

Please provide your written response to the address stated below.

Respectfully submitted,

Sincerely,

Delana Ruud  
10800 Cramer Rd.  
Auburn, CA  
February 22, 2019

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<b>Letter 64</b>	Delana Ruud February 22, 2019
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This comment letter is virtually the same as the content of comment letter 54. Therefore, the responses primarily cross-reference responses to this letter.

- 64-1 See response to comment 54-1. Also, the comment states that the project's conversion of farmland to a nonagricultural use would be significant, and further states that mitigation would only partially offset the impact because no new farmland would be created. See responses to comments 12-11 and 52-24 regarding the project's farmland conversion impact and accompanying mitigation measures.
- 64-2 See response to comment 54-2.
- 64-3 See response to comment 54-3.
- 64-4 See response to comment 54-4.
- 64-5 See response to comment 54-5.

Sunset Specific Plan EIR Comments

Letter  
65

My wife and I both commented at the February 14, 2019 Planning Commission meeting regarding this project. I have also included the comments I made during the NOP comment period, in an attachment, at the bottom of this email. As I stated at the public hearing on the 14<sup>th</sup>, we were disappointed to find out you were not going to answer all of the questions and comments received during the NOP comment period, but instead they would be “considered during analysis of potential impacts”. We feel all comments received about this project should be answered and or responded to by the county. Not just our comments, but ALL comments. The impression we are getting is that comments are just part of the “process” that you are going through, i.e. scoping meetings, comment periods, Planning Commission Meetings where the county staff does a 1-2 hour song and dance about how great the project is-but the audience only gets three minutes to talk-with no response to those questions or comments, etc etc. The appearance is your staff is “checking the boxes”, but doesn’t really care what the people/groups have to say. The following are questions and comments we would like answered/addressed:

65-1

First, we would like our questions answered and our comments addressed from the NOP comment period. Our other questions and comments follow.

**Section 4.2-4: Cumulative conversion of Farmland to nonagricultural use:**

-It states that “The project would result in the conversion of almost 6 percent of Placer County’s total farmland.” In the Lincoln News Messenger dated Thursday February 21, 2019 it states that Placer County just bought 300 acres on the western edge of the county to convert what was once irrigated pasture back into wetland and species habitat. That is another 300 acres out of agriculture production. It seems as if the “right to farm county” is singlehandedly removing farmland from within its boundaries. We are all for conservation, but conserving land for wetlands and species habitat, is not the same as protecting farming and farmland. You should be *protecting farmland*, which in turn would provide wetlands and species habitat.

**Several different chapters:**

-Your EIR/project is based on a number of items/programs that are not currently in effect.

--Chap. 4.9 references the Placer County Conservation Plan (“PCCP”). The PCCP however is not adopted nor has it been circulated for public review and comment. How can the public and the decision makers consider the PCCP in the context of the EIR if it has not been publicly disclosed? If not adopted, how can the Sunset Plan

65-2

and EIR adopt goals based on the PCCP (e.g. protecting stream channels as defined in the PCCP (see Policy PFS-5.3 for example).

-In one section of the EIR it states that the Ophir Water Treatment Plant will break ground in 2018. Not only did that NOT happen, according to PCWA, it could be 2029 before they break ground

- The Pleasant Grove Retention Facility is out of your control totally, but yet it is discussed at length at how you have no project without it, is that the best you could come up with?

-The Groundwater Sustainability Plan is not and will not be finished for years

-Your project/EIR counts on recycled water quite heavily, but that is currently not and will not be available for quite some time

65-2  
cont.

How many private projects for private developers has Placer County approved when it was based on things that don't currently exist? Are you setting a precedence that says to future development projects-as long as it might exist sometime in the future you can move forward with your project?

#### Chap. 4.9 - Hydrology and Water Quality:

-The EIR indicates there are presently two existing PCWA Wells at 1000 acre feet per year. And it also appears to indicate that two new wells would be drilled also at a capacity of 1000 acre feet per year. Is this accurate? How many wells are anticipated to be part of the project - 4 wells altogether for dry year water production? Or are there only two wells (e.g. the present PCWA wells)? It is difficult to tell from Chap. 4.9 of the EIR.

--The EIR does not appear to consider the 6 new wells proposed by the City of Lincoln for Village 5 when analyzing **cumulative impacts** - why not?

--What is the condition or mitigation measure that is enforceable that will limit the wells to single-dry year pumping only?

65-3

--The EIR discusses the monitoring of adjacent wells during the use of the Sunset Area Plan wells to determine potential adverse uses as mitigation. What does the Plan consider to be an adjacent well? For example, would existing agricultural wells north of the Plan area be included in the monitoring program?

--What conditions or enforceable mitigation plan is there under this plan that would compel and enforce such well monitoring?

--There does not appear to be any analysis regarding the impacts of dry-year pumping on flows in Auburn Ravine – correct from the wells? Wouldn't dry year pumping of

over 2000 to 4000 acre feet per year of groundwater potentially impact flows in Auburn Ravine?

--While we do recognize that there are many sources of water being discharged into Auburn Ravine, the inference in the EIR that little to no flows existed in Auburn Ravine during the Fall is incorrect. The Scheiber family has diverted water from the Ravine for 100 years and before delivery from PCWA, there was adequate fall flows to accommodate water diversions from the Ravine for use on our property.

- - If at some point in the future, the wells are to be used more often than set forth in the EIR, will there be a requirement for additional environmental review prior to allowing any additional pumping? Will that be a condition of approval of the Plan?

--Placer County and PCWA agree. do they not, that the wells for this project would not have priority over landowners with existing overlying groundwater rights - correct? If they do not agree, then why not? Why would a municipal well have priority over an overlying groundwater right - or have equal priority? Has the County done any analysis of impacts of pumping proposed for the project on existing overlying wells for agricultural uses?

65-3  
cont.

--There appears to be no plan, mitigation measure or contingency – or study – relating to the potential for contamination of groundwater from the Landfill. Why was this information omitted from the EIR? While the EIR references the landfill and its regulation by the RWQCB – there is no contingency or evaluation of potential contamination to groundwater resources. In section 4.9.2, page 4.9.6, under Groundwater Quality; it says “Contamination of groundwater with VOC’s was first identified at this site in 1995” (landfill). If there are a total of four wells that all get turned on in times of drought, as well as all of Lincoln’s wells, what will the cumulative effect be on spreading the contamination throughout the “regional cone of depression” that is discussed on page 4.9.6 under Groundwater Hydrology?

65-4

-Flooding seems to be an issue that is completely solved by the Pleasant grove Retention Facility and the City of Lincoln’s Lakeview Farms. But, as noted on page 4.9.30, four paragraphs up from the bottom, the County does not control either one of those sites AND neither one, as mentioned earlier, is complete. So is the flooding problem really solved?

65-5

Thank you,

Albert Scheiber, Scheiber Ranch

12/15/16

Notice of Preparation for Sunset Area Plan / Placer Ranch Specific Plan

To whom it may concern or cares;

I attended the 6:00-8:00 p.m. NOP Scoping Meeting on November 29, 2016. I've been to a lot of meetings but apparently never a scoping meeting. I did not realize there would be no answers given, only questions taken. I did not want to waste everyone's time with my concerns so at the conclusion of the meeting I was looking for a copy of the paperwork the eight or so attendees picked up on their way in. There were none left. I guess the eight or so attendees at the earlier meeting grabbed up all the extra copies. I ended up with about 7 or so of the staff around me wondering what my concerns were and willing to answer my questions because of the extra time they had available. I appreciated that, so I proceeded to ask my questions. It didn't take long before there was only one staff member left and the others had slowly drifted away. Guess they didn't want to answer my questions after all. So here are some of my questions/concerns:

1. How do I get the same benefit of the County fronting all the money, staff and time it takes to take a piece of property through the development process? In other words, if our property ever develops, how do I get that benefit paid for by the people of Placer County with no money out of my pocket?
2. If in the past two other private developers lined up to take on this project, then decided for whatever reason it would not work for them, doesn't this raise a red flag that the project is not a good project? I.e. Too much up front money to complete, no guarantees of potable water, too many environmental issues to mitigate, too much of the project would need to be dedicated (given away)making it unprofitable, etc etc.
3. How long will it be before you close the dump? In my opinion, by moving forward with this project the days are numbered for the dump, especially with the college dorms directly across the road from it. I live several miles away and in the summer it is not uncommon to smell it. The cupcakes living across the street from it will need a hepa filter in their safe room.
4. When did Placer County get into the "for profit" business? I asked why the County was running this project; the response was that the County felt the college was going to be a big money maker and economic draw.
5. How is a private developer supposed to compete with the County? PCWA is already installing potable water lines to supply the project, the PCCP is going to gain a large amount of land set aside for them, the Placer Parkway is on the wish list for a number of agencies, the dump is somewhat under County control, the private property owners are getting the benefit of the project at no cost to them, if a private developer fights against this project with any of these agencies or the county itself they will be on a short list, sounds to me like all the main wheels have been greased to avoid any major opposition. How is a private developer supposed to compete with the County?

6. Why is there no shortage of water for your project, but there is for others? I am in Zone 5 of the PCWA. Every year there is some kind of drama for us to get our raw water for the summer, but as stated above, PCWA is installing potable water lines to service your project before it's off the ground.

7. How can you move forward with a project with important items not in service? The potable water is to come from a plant that has not broken ground for construction yet. The PCCP is not approved. We don't have a regular shuttle to Mars.

8. How does this project or any development help agriculture? Seems like a lot of agriculture land will be lost with this project. Preserving some land with PCCP does not make up for the land lost for agriculture forever. I have the utmost respect for the Placer County Agriculture Department, but they are constantly losing productive land to development.

9. How is PCWA drilling wells for this project going to help sustain the ground water table? I was told at the scoping meeting PCWA will drill 2 wells just for this project, but only for emergency purposes, drought etc. I don't think that will help my wells in a drought.

I misplaced the business card from the lady at the Scoping Meeting that was the only one that stayed around to answer my questions. She was the one greeting all 8 of us (+or-) that attended the meeting. I would like to thank her for her time.

Sincerely,

Albert Scheiber

P.O Box 250

Lincoln. CA 95648

**Letter 65** | Albert Scheiber  
No date

65-1 The comment references scoping comments previously submitted to the County during the NOP public comment period (December 2016). These comments have been addressed or otherwise considered by the County during preparation of the Draft EIR.

The purpose of an NOP is to provide sufficient information about a proposed project and its potential environmental impacts to allow agencies and interested parties the opportunity to provide a meaningful response related to the scope and content of the EIR, including mitigation measures that should be considered and alternatives that should be addressed (State CEQA Guidelines Section 15082[b]). CEQA does not require lead agencies to prepare written responses to comments received on an NOP; however, lead agencies must consider all information and comments received. The information or comments may be included in the EIR in whole or in part (State CEQA Guidelines Section 15084[c]). The County reviewed and considered all comments received on the NOP, in accordance with CEQA. Appendix A of the Draft EIR contains the NOP and copies of scoping comments received during the scoping period. Some scoping comments presented "significant environmental issues," which were addressed in the Draft EIR (e.g., noise, air quality); others did not, and these were not addressed in the Draft EIR (e.g., opinions about the project, concerns about economic feasibility, etc.). The comments informed the scope and content of the EIR.

Regarding comments on a Draft EIR, 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).

The remainder of the comment is focused on farmland conversion. First, the comment reiterates the Draft EIR conclusion on page 4.2-18 that the project would make a considerable contribution to the significant cumulative impact associated with overall farmland conversion in the region. This cumulative impact is determined to be significant and unavoidable in the Draft EIR. Further, the comment states that Placer County is a Right-to-Farm county that is supposed to be protecting farmland rather than removing it from production. The County's Right-to-Farm Ordinance is described on pages 4.2-11 and 4.2-12 of the Draft EIR. The project's potential to indirectly convert Farmland and/or conflict with land use buffers for agricultural operation is discussed under Impact 4.2-3 on pages 4.2-15 through 4.2-17 of the Draft EIR, wherein the impact is determined to be less than significant because it would be subject to land use buffers between agricultural and nonagricultural uses, and because some agricultural areas adjacent to the PRSP area are planned to be developed as nonagricultural uses. Also, see responses to comments 12-11 and 52-24 regarding the project's farmland conversion impact and accompanying mitigation measures.

- 65-2 The commenter asks whether it is acceptable for the SAP and PRSP to rely on plans that have not yet been published or facilities that have not yet been constructed. As long-term planning documents it would be inappropriate for the SAP and PRSP to ignore in-process plans being prepared concurrently, especially when substantial information is available related to those plans and when it is reasonably foreseeable that those plans would eventually be adopted. However, the commenter is not correct to suggest that the SAP and PRSP *rely* on those plans. For example, the Draft EIR is clear that although it includes the Pleasant Grove Retention Facility as part of the project and as a primary option for stormwater retention for most of the PRSP area, there are alternate options identified, including on-site retention options, in case the Pleasant Grove Retention Facility is ultimately not selected as the provider of stormwater retention capacity. See response to comment 52-14 and Master Response 6: Drainage and Flooding for more information. Similarly, although the Draft EIR identifies the PCCP as a mitigation option for biological resources, it also provides contingency measures in case the PCCP is not adopted. As a result, changes to these facilities or planning documents would not alter the findings of the Draft EIR.
- 65-3 The comment asks several questions related to groundwater wells and existing water rights. As discussed in Impact 4.9-2, water services in the SAP would be provided by the PCWA. Apart from dry years, PCWA provides water services based entirely on surface water supplies. PCWA owns two ground water wells that are reserved for emergency and backup use during a single dry year. In multiple dry year scenarios, PCWA would modify surface water agreements to avoid use of the groundwater wells. These wells are located within the SAP but would not be used directly by project and no new wells would be constructed to support the project. PCWA's limited use of groundwater would occur in accordance with the 2007 Western Placer County Groundwater Management Plan (GMP) which includes regular groundwater monitoring in accordance with California Water Code Section 10750. As part of this program, over 32 groundwater wells are monitored throughout Placer County with plan to extend the monitoring network to include at least one monitoring well within each unit of a 5-square-mile grid. Additionally, participants in the GMP are working with the Department of Water Resources to correlate groundwater level data with river state data and to understand groundwater interactions with local steams such as Auburn Ravine and Coon Creek. PCWA would continue to comply with existing water rights and state water management regulations. No aspect of the proposed project would modify the structure or precedence of existing water rights. Additional information can be found in the GMP. Because PCWA is a public agency it is required to comply with

CEQA when it undertakes a project, defined as an activity that may cause direct or indirect change in the environment. A decision by PCWA to increase reliance on groundwater sources could be defined as a “project” under CEQA and would likely require environmental review. The potential for cumulative impacts to groundwater was analyzed in Impact 4.9-7 and considered the cumulative projects listed in Table 4.0-2. This list includes the City of Lincoln Village 5 project.

- 65-4 The comment asks why the Draft EIR did not consider the potential for the WRSL to contaminate groundwater. The WRSL is an existing and active landfill. Operations and the WRSL would continue similar to existing conditions with the implementation of the SAP. Independent of the SAP and PRSP, the WRSL is proposing an expansion of landfill operations. As discussed in Section 4.9.2, the landfill operates under waste discharge requirements established by the Central Valley Regional Water Quality Control Board in Order No. R5-2007-0047. Contamination of groundwater with volatile organic compounds (VOCs) was first identified at this site in 1995, and a corrective action plan was approved by CVRWQCB in 1997. The source of the VOCs appears to be landfill gas, a product of the action of microorganisms within a landfill (Placer County 2015). The corrective action plan requires the installation of a final cover and a landfill gas extraction system on closed areas of the site. To monitor the effectiveness of the plan, specific corrective action wells are sampled quarterly and evaluated for inorganic and organic constituents (Placer County 2015). This existing source of groundwater contamination is discussed further in Draft EIR Section 4.8, “Hazards and Hazardous Materials.”
- 65-5 The comment questions the proposed use of stormwater retention facilities that are not owned by the County. See response to comment 52-14 and Master Response 6: Drainage and Flooding.

**From:** barbara smith <smithbarbv@gmail.com>  
**Sent:** Friday, February 22, 2019 10:17 AM  
**To:** Placer County Environmental Coordination Services  
**Subject:** Sunset Area Plan/Placer Ranch Specific Plan

<b>Letter 66</b>
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Ms. Shirley Herrington  
 Placer County Community Development Resource Agency  
 Environmental Coordination Services

Dear Ms. Herrington:

I'm writing today in response to the December 2018 Draft Environmental Impact Report (DEIR) for the Sunset Area (SA) Plan and the Placer Ranch Specific Plan (PRSP) areas. I am concerned that the numerous and consequential negative impacts outlined by the report will be overlooked and that further review won't occur.

The DEIR documents serious consequences upon public health, air quality, housing, wildlife, and mobility in the proposed Placer Parkway transportation systems if this plan were to go forward as presented in the DEIR. There are enough concerns in each of these areas that accepting the report as it stands would be inappropriate.

I respectfully request the DEIR be revised to include significant studies on the impacts of this project on surrounding areas, and the Citizen Initiated Smart Growth Plan created by the Alliance for Environmental Leadership be analyzed and considered as a viable project alternative.

Thank you for your time and consideration. I look forward to receiving your written response via this email.

Barbara V. Smith  
 February 22, 2019  
 915 Fawn Creek Trail  
 Auburn, Ca 95603

66-1

*Bad officials are the ones elected by good citizens who do not vote.  
 George Jean Nathan*

<b>Letter 66</b>	Barbara V. Smith February 22, 2019
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66-1 The comment expresses concern that the impacts identified in the Draft EIR will be overlooked and that further review will not occur. See response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts, which include specific requirements for public agencies to consider potentially significant adverse environmental effects of projects before taking action on those projects; avoid or mitigate, wherever feasible, the significant adverse environmental effects of projects it approves or implements; and prepare findings and issue a “statement of overriding considerations” explaining why they believe, based on substantial evidence, those significant effects are acceptable. The County has complied with CEQA requirements by identifying the project’s significant and unavoidable impacts in the Draft EIR. As part of the project approval process, the Placer County Planning Commission and Board of Supervisors will review and consider the EIR analysis as well as all comment letters submitted during the Draft EIR public review period and the written responses to those comments before a decision on the project is rendered.

The comment also expresses concern about the project’s effects on public health, air quality, housing, wildlife, and the transportation system. These issues are addressed in their respective sections of the Draft EIR. No specific issues related to the adequacy of the content, analysis, or conclusions in the Draft EIR are raised in this comment. No further response is warranted.

Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, 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. Also see Master Response 8: Recirculation.

**From:** Roger Smith <rsmith2009@gmail.com>  
**Sent:** Thursday, February 21, 2019 7:01 PM  
**To:** Shirlee Herrington  
**Subject:** Comments on DEIR

**Letter  
67**

TO: Placer County Planning

The Draft EIR for the **Sunset Industrial Area Project and the Placer Ranch Specific Plan** revealed 60 significant and unavoidable impacts to the environment that will cause health, safety and quality of life impacts to the public, create a jobs housing imbalance that will exacerbate the existing available housing crisis, put resident and migratory animal species at risk of extinction and jeopardize the planet with GHG. The DEIR is incomplete and inadequate because it fails to suggest, or properly analyze, an 'Alternative Project' that lessens adverse and unavoidable impacts to a less than significant level. The absence of such an Alternative does not allow the County to make an informed decision about the Project. I respectfully request that you recirculate the DEIR and 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.

67-1

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

Roger Smith  
Newcastle, CA  
(916)652-5685  
(916)300-6310 cell

**Letter  
67** | Roger Smith  
February 21, 2019

67-1 This comment letter is virtually the same as the content of comment letter 55. Therefore, this response simply cross-references to responses to this letter. See response to comment 55-1.



**From:** angela4rocklin@yahoo.com  
**Sent:** Friday, February 22, 2019 4:38 PM  
**To:** Shirlee Herrington  
**Subject:** Placer Sunset Area Plan DEIR

<b>Letter</b> <b>69</b>
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- Dear Ms. Herrington:

*This week I had the opportunity to review the Draft EIR for the Sunset Industrial Area Project and the Placer Ranch Specific Plan. The Draft reveals up to 60 significant and unavoidable impacts to the environment that will cause health, safety and quality of life impacts on the public, and further create a jobs housing imbalance that will exacerbate the existing available housing crisis. The DEIR also puts Placer residents at odds with promising environmental degradation, loss of rare habitat, a project that will significantly affect local migratory environment of rare birds and animal species, vernal pools, migratory birds that rely significantly on food, migratory breeding grounds where vernal pools now exist, reptiles, fauna and flora stand to be annihilated should this project go forward without significant mitigation. The Draft EIR for the Sunset Industrial Area Project and the Placer Ranch Specific Plan revealed 60 significant and unavoidable impacts to the environment that will cause health, safety and quality of life impacts to the public, create a jobs housing imbalance that will exacerbate the existing available housing crisis, put resident and migratory animal species at risk of extinction and jeopardize the planet with GHG. The DEIR is incomplete and inadequate because it fails to suggest, or properly analyze, an Alternative Project that that lessens adverse and unavoidable impacts to a less than significant level. The absence of such an Alternative does not allow the County to make an informed decision about the Project. I respectfully request that you recirculate the DEIR and 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. Please accept my written response to the SA/PRSP DEIR. I look forward to your written reply.*

69-1

- Sincerely, Angela Torrens residing at: 5313 Swindon Road, Rocklin, CA 95765

✉ **Angela Torrens**

Sent from Yahoo Mail on Android

<b>Letter</b> <b>69</b>	Angela Torrens February 22, 2019
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69-1 The comment expresses concern about the project’s effects on public health and safety, quality of life, jobs/housing balance, and biological resources. 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. No further response is warranted.

The remainder of the comment letter is virtually the same as the content of comment letter 55. Therefore, this response simply cross-references to responses to this letter. See response to comment 55-1.

**Sent:** Emily Anne Ward <emilyanneadem6@gmail.com>  
**To:** Wednesday, February 20, 2019 9:20 PM  
**Subject:** Placer County Environmental Coordination Services  
 Sunset Area Plan/Placer Ranch Specific Plan DEIR Report -  
 State Clearinghouse No. 2016112012, Vol. 1&2

<b>Letter</b> <b>70</b>
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Dear Ms. Herrington:

Thank you for the opportunity to review the December 2018 Draft Environmental Impact Report (DEIR) for the Sunset Area (SA) Plan and the Placer Ranch Specific Plan (PRSP) areas. The review is in accordance with the California Environmental Quality Act (“CEQA”) and Public Resources Code, Section 21000, et seq. CEQA requires the County address and fully mitigate the effects of the plan upon public health and natural resources, etc. It is noted the County used Ascent Environmental company to gather some data and methodology used in your Tables. However, upon further review, we find the DEIR reveals significant and unavoidable impacts in almost every category. Negative impacts will impose serious consequences upon public health, air quality, housing, wildlife, and mobility in the proposed Placer Parkway transportation systems if this plan were to go forward as presented in the DEIR. (See Exhibit 1-2 Proposed PRSP Land Use Plan) Population/Employment/Residential Impacts in Specific Plan Areas:

The DEIR, a voluminous environmental draft document covers a dynamic area and will serve as a guide to the growth of over 8,047 acres of land located in the western portions south Placer County. A specific plan, the Sunset Area (SA) Plan located within the City of Roseville and surrounding many existing neighborhoods where a future buildout of (yet undetermined) a college campus is expected. The college campus combined with surrounding land uses projects an increase in student population of up to 30,000 students at buildout. A regional retail district is included in SA; twice the size of the Galleria, Fountains, and adjacent box stores combined; and will compete with existing retail in Lincoln, Rocklin, and Roseville. The inclusion of more retail will result in low paying wage jobs that will not support the costs of housing or travel in these plan areas.

70-1

In addition, the location of SA area plan in Lincoln/Rocklin includes the addition of 5,636 low-density housing units to be built within 1000 feet of Western Regional sanitation plant/Landfill facility with no adequate buffer. Landfill and Buffers: (See Land use 4.10.1) which allows residential development as close as 1000 feet and suspected odors that will affect public health.

The whole project area projects up to 13,219 new residents living in the entire SA and PRSP project area and the lack of studies upon the air quality with close proximity to a landfill or the buildout of Placer Parkway is not fully litigated in the DEIR. According to the DEIR (Section 4.3-5) the Western Placer Waste Management Authority is actively engaged in a planning process ...odor abatement strategies, the nature, and effectiveness of those strategies are as yet unknown, no quantifiable thresholds of significance for odor impacts is offered, and no existing fee program or other mechanisms used to fund the costs of odor mitigation is absent in the DEIR. This impact would be significant upon public health is not fully mitigated.

Transportation and Traffic and Air Quality Placer Parkway (PP): A Multi-land expressway included in the plan offers no other transit alternatives that reduce carbon monoxide (CO2 emission from vehicles) negatively affecting air quality standards as imposed by the California Air Resources Board (ARB). PP creates significant roadway construction and right of ways in the SIA and PRSP areas; noise, air quality is considered unavoidable and significant. Long-term emissions exceed the maximum allowed under the ARB guidelines with no off-site mitigation plan and significant/unavoidable effects upon public health. Toxic air contaminants will exist within 500 feet of Hwy 65 which currently experiences up to 100,000 vehicle trips per day. Hwy 65 will be congested with at least 895,317 new daily vehicle trips per day (this does not include surrounding freeways I-80 and I-50 which will connect to the proposed Placer Parkway). Significant negative impacts need to be fully mitigated to avoid serious impacts of bad air quality upon Placer residents.

70-2

The DEIR does not study the cumulative effects upon the species existing in the plan area, the effects upon the loss of 7,297 acres of farmland, species, fauna/flora, and vernal pools as per CEQA Guidelines section 15082(a) (1) will require specific mitigation studies not mentioned in the DEIR. The most significant effects are shown in Table 4.2-1 DEIR as farmland is proposed to be converted to non-ag use, a significant impact upon farmland production for the Placer/SACOG region.

70-2  
cont.

Water Quality:

Under the SAP and the PRSP Plan, stormwater runoff from Auburn Ravine and Pleasant Grove Creek, nearby watersheds has no CEQA analysis done on the impacts of water runoff, including mitigation of adjacent areas outside of the county boundaries. Therefore, the DEIR is not taking into consideration the effects of the combined water-sheds which may have a significant negative impact upon water runoff in our Placer communities upon full build-out of the project plan areas.

70-3

I respectfully request the DEIR be revised to include significant studies on the impacts of this project on surrounding areas, and the Citizen Initiated Smart Growth Plan created by the Alliance for Environmental Leadership be analyzed and considered as a viable project alternative.

Thank you for the opportunity to provide comments on the DEIR. Please provide your written response to the address stated below.

Respectfully submitted,  
Emily Anne Ward  
2/20/19  
316 Brookwood Rd,  
Roseville, CA 95678

**Letter** | Emily Anne Ward  
**70** | February 20, 2019

This comment letter is virtually the same as the content of comment letter 54. Therefore, this response simply cross-references to responses to this letter.

- 70-1 See responses to comments 54-1 and 54-2.
- 70-2 See responses to comments 54-3 and 54-4.
- 70-3 See response to comment 54-5.

LFW

Letter  
71

February 22, 2019

Placer County Board of Supervisors  
EJ Ivaldi, Planning Director  
3091 County Center Drive #140  
Auburn, CA 95603

attn: Shirlee Herrington, Environmental Coordinator (email: sherring@placer.ca.gov)

Dear Ms. Herrington:

The pages that follow describe the fundamental and basic inadequacy of the Draft Environmental Impact Report for the Sunset Area Plan and the Placer Ranch Specific Plan (Project). I address some, but not all of the inadequacies.

The DEIR needs to be recirculated because it fails to comply with the requirements of CEQA, fails to mitigate for the Project's environmental impacts and fails to consider a Project Alternative that is capable of eliminating the Project's significant impacts.

The County is in the process of preparing an economic/fiscal analysis of the Project. CEQA requires, at a minimum, that the DEIR present all relevant facts regarding the Project's fiscal impacts. To continue processing the DEIR prior to completion of the economic/fiscal analysis is in violation of CEQA, because the economic/fiscal analysis could affect the project description, which could also affect the various analyses of the EIR.

The major concerns that would be addressed in the economic/fiscal impact study and that are critical include:

- Although the County/project proponent has claimed there is sufficient student demand to support a Sacramento State satellite campus, there is observational evidence that this statement may not be valid. The attendance at Sacramento State University has remained stagnant for the past decade and enrollment at Sierra College has dropped. In addition, Internet college degree curricula are becoming increasingly popular and may disrupt traditional college campuses.
- Is there sufficient funding to support the construction and ongoing operational costs of the University? Since the State University system provides minimal funding in support of satellite campuses, this will result in a significant funding obligation for the ultimate developer of the specific plan and other funding sources. What is the County's potential funding obligation?
- The economic/fiscal analysis needs to verify that the increased employment generation, increased tax revenues, labor income and annual economic output benefits cited by the County to process the Placer Ranch Specific Plan through the development review process are accurate.
- Although the County has a memorandum of understanding with the property owner of the Placer Ranch property, this may not be sufficient to guarantee full repayment to

71-1

71-2

the County plus interest. The economic and fiscal impact study needs to evaluate the long term fiscal costs to the County for funding a specific plan for a private developer, the cost of funds and whether the MOU constitutes a gift of public funds; also, does the MOU protect the County’s financial interests should the property be sold?

71-2  
cont.

- The potential for the Project commercial centers to have an economic impact on neighboring communities is not addressed in the DEIR. Such economic impact may include closure of stores and urban decay in existing retail centers leading to physical blight and loss of sales tax revenue to the County and Cities.

**Observations related to the DEIR sections and listed impacts:**

**Section 3.1 Overview:**

The DEIR overview fails to describe the very “nature’ of this dynamic site in the “Project Description Overview”. This omission allows the DEIR to perpetuate a false narrative that limits the public and decision makers’ ability to understand how the natural systems in the SAP function. The DEIR overview must be revised to provide a description of the unique soils, edge conditions, hydrology and seasonal functions in order for the public and decision makers to conduct a meaningful review and make conclusions about the Project’s impacts.

71-3

**1-7 Contribution to substantial light that would adversely affect nighttime views**

While the DEIR concludes that light pollution impacts will be substantial and unavoidable to Aesthetic considerations, it fails to analyze the substantial adverse impact that light pollution will pose to species. The SAP is a part of the Pacific Flyway. Migratory fowl that rely on stars for navigation use vast areas of the SAP for forage and rest. The West Placer prairie also supports the second highest density of migratory raptors. The DEIR fails to analyze how light pollution affects raptor populations - particularly owls – that rely on darkness to locate and secure prey. The DEIR fails to address the impact that light pollution will have on wetland habitats within and adjoining the SIA/PRSP (including the planned PCCP and the four mitigation sites north of the project area and mitigation areas within the Pleasant Grove Retention Basin) that are home to amphibians, such as frogs and toads, whose nighttime croaking is part of the mating ritual and is stimulated by darkness.

71-4

The DEIR fails to address the effect of light pollution on mammalian populations’ survival capacity. Most mammals sleep during the day and are active at night. The DEIR must analyze the likely disruption that light pollution will have on their nocturnal activity, hunting capacity and reproductive activity.

The DEIR fails to address the impact of light pollution on human health, including disrupting circadian rhythms, melatonin levels, and generally contributing to sleeping disorders. These issues must be addressed and mitigated and until this is done, the DEIR is incomplete and inadequate.

**4.2 -1 Conversion of Farmland to non-agricultural use**

In the County’s General Plan, the Project has long been established as a place reserved for industry and agriculture, where suburban sprawl could not transgress. Baited by a promise of a University, the County is abandoning its own best interest and is planning on opening the SA to low density urban sprawl and taking 7,295 acres of farmland with it. The DEIR fails to address how the County’s intent to turn its back to the State’s agland conservation policies and legislation will affect the County in the future, including what opportunities for State funding the County will forgo.

71-5

The DEIR states that farmland may be protected through the approval and implementation of a series of farmland preservation and management plans on a 1:1 ratio - which is actually a net loss

and therefore inconsistent with County General Plan policy. Additionally, the fact that the approval and implementation of these farmland preservation and management plans is speculative and that no time frame is established for approval and implementation of these plans makes mitigation measure 4.2-1a inadequate.

4.2.-16 describes a mitigation whereby mitigation lands would be protected by farmland conservation easements. This is not habitat mitigation. Farmland mitigation and habitat mitigation are mutually exclusive. Land used for farming is generally not habitat. Farms can be managed in such a way that migrating birds can use it in the fallow season (flooded rice fields), but farmland does not provide habitat for non-migratory animals. This mitigation should be removed.

DEIR is incomplete because it fails to:

- establish the cumulative impact of agricultural lands conversion in the SAP to CA greenhouse gas reduction goals.
- quantify the tonnage of GHG sequestered annually in the Project area and account for the loss of annual and future GHG sequestration value when calculating GHG generation. If the project will generate 550,000 metric tons of CO2 annually, how much CO2 sequestration is being lost as a result of development.
- quantify the tonnage of GHG to be released from soils during the construction phase of the SIA and PRSP projects
- identify the cumulative loss of greenhouse gas sequestration potential over the 80 year life of the proposed project.
- compare the projected GHG emissions from urban uses proposed in the SAP/PRSP to GHG emissions from agricultural activity (per acre, urban uses contribute 70 times more GHG than active agricultural activity) over the life of the project
- explain how, as project proponent for the conversion of 7,295 acres of agricultural land to urban uses, Placer County’s ability to enforce of its own Agricultural Lands Conservation Policy will be impacted.
- consider how the loss of 7,295 acres located in close proximity to an urban center could potentially impact food production, availability and flexibility as impacts of climate change become more severe
- Consider how a projected 8’ sea level rise during the 80 yr. Project build-out will affect development potential of low lying farmland.

71-5  
cont.

**4.4 Biological Resources**

In the mitigation measures proposed to reduce impacts to biological resources, the DEIR states that the developer will hire a qualified biologist to accomplish specific mitigations. The DEIR does not establish a time frame for mitigation monitoring for specific impacts to biological resources.

The DEIR does not explain how the County will monitor the developer’s mitigation compliance for accuracy, completeness or compliance with the DEIR mitigations. Neither does the DEIR explain how the County will fund mitigation monitoring or establish which County staff will be required to perform the oversight. Because it is likely that a number of separate projects by separate developers will be undertaken simultaneously, the staff requirement and cost to oversee mitigation monitoring may be substantial. The DEIR is incomplete until a process for County oversight of biological resource mitigation protections is established and defined as a mitigation.

71-6

**Impacts on SAP Conservation Reserves:** The SAP is home to two watersheds, the Orchard Creek, Auburn Ravine and Coon Creek Watershed and the Pleasant Grove and Curry Creek Watershed. These watersheds’ summit runs generally east-west across the SAP and drain to the Sacramento River. Orchard Creek watershed drains north to four major conservation and mitigation banks -the Warm Springs Mitigation Bank (which is omitted from DEIR maps), Moor Ranch Conservancy, Antonio Mountain Ranch and Orchard creek Conservation Bank. These Banks will become part of the Placer County Conservation Plan (PCCP) area - if the PCCP is approved.

71-6  
cont.

The DEIR fails to analyze the impact of the Project on the four biological resources and function. Upstream modification of the sensitive vernal pool habitat that can bring about degraded surface water quality, grading, excavation, accidental spills of hazardous substances, removal of the natural headwaters and the underlying clay pan, removal of a vernal pool complex and drainages that feed the reserves, excavation and topographic leveling, soil compaction and a general change to runoff patterns must be evaluated and mitigated in the DEIR.

**4.4-6 Loss or degradation of riparian habitat**

The DEIR states that no special status fish species are known or expected to occur in the project area. This is false. Recent Fish and Wildlife studies observed that juvenile winter and spring run salmon move into and use lower Auburn Ravine and Pleasant Grove Creeks (due to its warmer temperature and abundant food supply which may lead to higher growth rates and conceivably better survival of salmon).

The DEIR describes the significant effect of channelization and weir installation along of 3900 feet of Pleasant Grove Creek and the installation of control structures and the removal of all riparian vegetation and the habitat values provided herein in connection with the Pleasant Grove Retention Facility. It does not however, analyze the effect of disruption of Pleasant Grove Creek on fisheries. This activity will potentially have a significant impact on the juvenile salmon and on migratory salmon, steelhead and resident trout. The streams that will be impacted with the SAP are essential to the recovery of severely diminished winter and spring run Chinook salmon as well as sustain numerous resident trout that can transform into migratory steelhead. Numerous community organizations monitor and work actively at restoration of Western Placer streams. Ensuring adequate water flow and water quality as well as gaining year-round fish passage to and from the Sacramento River are essential to stabilizing population. With major alterations proposed to system water conveyance, governance, storage, in stream flows, mitigation requirements and fishery management, it is critical that the DEIR address potential impacts on fisheries so that populations are protected and monitoring systems are in place. The DEIR fails to provide a full analysis of impact to threatened and endangered fish species, nor does it propose adequate mitigation necessary to ensure survival of salmon, steelhead and trout populations.

71-7

Pleasant Grove Creek Channelization: The DEIR fails to analyze how channelization of 3900 feet of Pleasant Grove Creek and the removal of associated riparian forest will impact fisheries.

**4.4-5 Disturbance or loss of special status species**

The DEIR fails to survey for threatened or endangered insect species or consider how the removal of West Placer prairie will affect insect populations regionally and impact the function of the PCCP, Warm Springs Mitigation Bank (which is omitted from DEIR maps), Moor Ranch Conservancy, Antonio Mountain Ranch and Orchard creek Conservation Bank and mitigation habitat in the Pleasant Grove Retention Basin.

71-8

Insects are in a perilous condition according to a new global scientific review, with more than 40% of insect species threatened with extinction, while the mass of insects is declining at 2.5% a year. This catastrophic decline is an existential threat to other animals, since insects are at the bottom of the food chain and the primary food source. Habitat loss is a key driver toward this mass extinction.

71-8  
cont.

The DEIR fails to analyze how the cumulative loss of pollinator habitat will impact regional farm production and food supply.

**4.4-5 Monitoring Disturbance of Special Status reptile, bird, mammal and fish species**

The mitigation measures proposed for special status species are inadequate. The mitigation states that if species are found during a survey or observed within the construction site, a qualified biologist shall relocate them to the nearest area with suitable habitat.

71-9

If a pond turtle, for example, is found to occupy a pond in the nesting season, the DEIR calls for a qualified biologist to relocate it to an alternative suitable habitat. The DEIR provides no protections for eggs that the Western Pond Turtle may have laid. As Western Pond Turtle eggs are buried, the DEIR should mitigate impacts to these eggs by stating that no construction activity will take place at sites providing habitat suitable to Western Pond Turtles during nesting season and the period that eggs are incubating and hatching.

**4.4-8 Interfere substantially with wildlife movement**

I applaud the DEIR for the mitigation 4.4-8a to create wildlife crossings for safe wildlife passage over and under the Placer Parkway. (The DEIR fails to provide similar protection for human population movement over and under the Placer Parkway)

71-10

**4.7 Greenhouse Gas Emissions**

**Trucks v Automobiles**

The DEIR fails to establish how many of the VMT will be by heavy trucks and distinguish the total GHG emission from trucks v automobiles. Because the SAP is an industrial, manufacturing and warehousing Project and will also create two regionally serving retail centers, accounting for the the number of heavy truck trips servicing and delivering and moving cargo out of the Project site is relevant to the analysis. Additionally, the DEIR fails to address the GHG impact of truck engines, which are left idling for hours of time, nor how prevailing winds will distribute this static pollution source. The DEIR fails to consider how concentration of a major manufacturing and industrial center near to schools and single-family residential uses will affect the health and welfare of these sensitive populations. The DEIR must analyze how proximity to heavy truck traffic will affect the safety and health of pedestrian and bicyclist who will share the roadways.

71-11

**Heat Islands**

The DEIR fails to analyze the heat island effect that will be created with development of the Project. The heat island effect affects communities by increasing summertime peak energy demand, air-conditioning costs, air pollution and greenhouse gas emissions, heat-related illness and mortality and water quality. Air temperature caused by roof and pavement surfaces warmed on a summer’s day can be as much as 22 degrees warmer than the air in neighboring, less developed regions. At build out, the SAP will be 83% parking lots and roadways and 17% structures.

71-12

To combat heat island effects, the US EPA has developed specific mitigation measures, which the DEIR fails to consider.

Prevailing winds from the west in the summertime will move the atmospheric heat island across the landscape and into neighboring communities and the Sierra Nevada. The DEIR fails to analyze the impact of this phenomenon on neighboring communities and on flora and fauna in Sierra wildlands and how the atmospheric heat island will contribute to wildfire and tree mortality.

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cont.

**4.12 Population and Housing**

**The County General Plan**

State law requires each community in California to provide its “fair share” of the region's housing needs through its housing element. The DEIR 4.12.2 states that between 2013 and 2021, SACOG, which is responsible for allocating the “fair share” calls upon Placer County to provide 5,031 units available to very low, low, moderate and above moderate income levels. The DEIR is inadequate because it does not indicate to what extent Placer County has achieved its “fair share”. This is important because the growth area of SAP represents perhaps the best opportunity to achieve affordable housing. With the limited information available in the DEIR, it is not possible for citizens or decision makers to determine if the SAP/PRSP is moving the County toward achievement of the “fair share”.

The market analysis prepared for the SAP found that a jobs housing ratio of one home to five jobs is ideal. The SACOG Blueprint calls for a 2:1 jobs housing ratio. The concept of balance is based on the assumption that if a community provides housing proportionate to the number of jobs in the community, the majority of residents would have the opportunity to work and reside in the same community. The SAP/PRSP has a 22:1 jobs housing imbalance. The DEIR fails to analyze if the 22:1 jobs housing imbalance will put upward price-pressure on all housing types - but most particularly workforce housing. The DEIR fails to adequately address the impact of this imbalance on VMT and GHG. The DEIR fails to provide decision makers and the public information necessary to determine what income groups will be most adversely impacted by the jobs/housing imbalance.

71-13

The proposed Sunset Area Plan Policy: LU/ED-4.5 encourages “the development of workforce housing to accommodate local employees, particularly housing affordable to service industry workers”. Service industry workers will, in fact, constitute the majority of the 57,000 new jobs to be created in the SAP/PRSP. The DEIR fails to describe to what extent the housing needs of this population will be met in the SAP/PRSP.

Contrary to the County’s own proposed Workforce Policy, in the SAP, workforce housing is permitted only by special use permit and limited to 2,500 units. The DEIR fails to analyze how the special permit status may, in itself, discourage workforce housing construction.

There are three school districts proximate to the PRSP. The DEIR fails to establish that these school districts will provide a “will-serve letter” to operate elementary and middle schools (and a University) within the one mile buffer of the MRF.

**4.13-4 Increased demand for library services**

The DEIR acknowledges the need for library services but fails to establish a mechanism to guarantee that one is built. The land use map for the Project designates no site for a library nor does it set up a funding mechanism for library construction and operation. The DEIR mitigates the recognized demand for library services through a mechanism called a landowner-approved special tax. This mitigation is inadequate because the library tax is discretionary and subject to developer initiative. Instead of mitigating this significant impact with a developer-initiated tax, the mitigation should

71-14

impose fees upon the developer and establish a funded plan to build a library. The proposed mitigation is inadequate.

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cont.

**4.14.4 Bicycle and Pedestrian System as Factor in reducing VMT**

Bicycle and pedestrian routes are proposed to be established alongside major traffic arteries throughout the SAP. The DEIR fails to analyze how heavy truck traffic from the industrial uses proposed in the SAP/PRSP will impact the health and safety of bicyclists and pedestrians who may utilize these routes. Cities and Counties are increasingly providing dedicated lanes for pedestrians and bicyclists, separated from traffic with curbs and planting strips. The DEIR fails to analyze how dedicated and separated bicycle and pedestrian paths could reduce VMT on major thoroughfares including Placer Parkway, Sunset Blvd., Campus Park Blvd., Fiddymment Road and University Village Dr.

71-15

Additionally, the DEIR provides no analysis of how pedestrians and bicyclists will safely cross Placer Parkway, Sunset Blvd., Campus Park Blvd., Fiddymment Road and University Village Drive. A provision for pedestrian overcrossing and/or under crossings should be analyzed.

**4.14.13 Impacts to transit**

In 4.14.13, the DEIR established that demand for public transit will have a significant impact on the Project. Yet, in the 14.9 sq. mi. SAP, only one bus route is proposed, despite the stated Policy Goal TM-1 "The County will develop a balanced multi-modal transportation network in the SAP". The DEIR is inadequate because it relies on a future Placer County Transportation Agency Plan to address the significant demand for transit and because of the SAP's failure to provide comprehensive transit access based on proposed land uses and as a mitigation for significant impacts.

The DEIR is inadequate because none of the project Alternatives are smart-growth that might support a vigorous bus system supported by higher density development.

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4.14-16-20 The DEIR is inadequate because all mitigation for level of service impacts call for increased capacity. The DEIR fails to consider the Institute of Transportation Studies, University of California, Davis report on Roadway Capacity and Traffic Congestion. In that Study, an increase in roadway capacity actually led to increases in VMT. The study found that when roadway capacity increases, it decreases travel time causing the quantity of driving to go up. So, the effectiveness of capacity expansion described in the DEIR as a strategy/mitigation for alleviating traffic congestion, will not actually relieve traffic congestion caused by the Project, it will increase it; and therefore the DEIR is inadequate.

**4.15.13 Utilities**

The DEIR fails to address the role of Pioneer Electric in the provision of electrical services to the SAP/PRSP. Pioneer Energy is listed in Table 4.15, but no further discussion of Pioneer Energy is included in the DEIR. It has come to my attention that counties discount and even offer free energy to attract developers and tenants.

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The DEIR fails to establish if Pioneer Energy's policies and procedures adequately protect citizen ratepayers from subsidizing future occupants of the SAP/PRSP. This is a concern because of the potential fiscal impact on Pioneer ratepayers communitywide.

**4.15-11 The potential impact on the Western Regional Regional Landfill from incompatible land use that results in insufficient permitted capacity to serve disposal.**

71-18

The DEIR states public complaints about the MRF odors and the MRF’s ability to expand are less than significant, based on a conclusion that other Material Recovery Facilities have expanded despite odor complaints. This is an inadequate response because not only is the County building a new community within the one mile buffer, it is proposing to reduce the buffer to as little as 500 feet. Nowhere in the DEIR is there a discussion of public complaints correlated to distance from the odor source. So, to simply say that other facilities have expanded despite public complaint is meaningless without context, unrealistic, subjective and inadequate. Further, the DEIR fails to address the County’s own legal action to protect the MRF buffer in 1997 because its own concerns about expansion capability and the precarious legal precedent this earlier litigation sets.

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cont.

**2.6 Issues to be resolved**

**Cumulative List:** The DEIR is incomplete because it does not provide a composite list of all fees and assessments and special districts connected with development of any parcel in the SAP/PRSP. The absence of this composite list leaves decision makers and the public with insufficient information to make an informed decision about project impacts. Only through disclosure of all of the fees, special districts, special taxes and assessments proposed DEIR as mitigation are developers, decision makers and the public positioned to meaningfully review and make conclusions about the Project’s impacts.

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Another benefit of a comprehensive list of all fees, assessments and special districts is that it will allow the public to monitor the Project to ensure that fees and assessments are adequate and fairly and consistently applied to developers.

**Fiscal Responsibility:** The County is in the process of preparing an economic/fiscal analysis of the SAP/PRSP. The DEIR is inadequate because it neglects to present all relevant facts relating to the Project’s fiscal impact. In the absence of this analysis, citizens and decision makers have insufficient information to establish the feasibility of revenue sources, which is a CEQA minimum requirement.

Major Fiscal Concerns Include:

- PCCP fees for development of the 300 acre University parcel will exceed \$40,000,000, which is twice the value of the land, raising concerns that the University is infeasible. Because it is the anchor of the Project, this may affect various analyses and minimum requirements for Project feasibility overall.
- Pleasant Grove Retention Basin. This project has an anticipated cost of \$28,000,000-\$39,000,000. Only a cursory and superficial discussion of the project is included in the DEIR and no analysis is provided about how project funding would be accomplished against the SAP’s vague and fluctuating build out projections.
- County’s proposal to largely rely on a carbon offset program to mitigate the Project’s anticipated annual GHG emissions. The cost of the offset program is not specified nor is there evidence provided that the offset program would be enforceable let alone effective. Currently the Project’s operational GHG emissions would require offsets costing between \$370 million and \$1.6 billion.
- Project Objective describes the County’s intent “to generate revenue to fund countywide services” through project implementation. New development generally generates only \$.04-\$.64 revenue per dollar cost towards the cost to provide public goods and services. The DEIR fails to provide decision makers and the public an adequate picture of revenue generation from the Project over the 10, 20, 40 year build out projections or an analysis of the extent to which revenues from the general community will subsidize the project over the 80 year plan.

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These are not trivial defects. The DEIR must be revised to identify accurate, reasonable and realistic fiscal impacts and costs and the impacts to County financial stability that will occur throughout this entire development process.

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cont.

**Economics of Natural Ecosystems:** The DEIR is inadequate because it fails to measure, and therefore does not effectively evaluate, the benefits of ecosystem services received from the natural environment. The totality of ecosystem services and the organisms that provide them is called natural capital. Investing in natural capital and coming up with a measure of the economic value that its health and viability gives us, is an economic measure that the DEIR must consider when determining an environmental impact and whether the benefits of Project development exceed environmental benefit received from the natural environment.

Google’s Earth Engine is a source of data on the value of these ecosystem services, as is Stanford University’s InVEST (the integrated Valuation of Ecosystem Services and Trade-offs). These sources put a monetary value on the benefits of farmland carbon sequestration and other natural capital and offer data to allow comparison of level-field comparison of the value of habitat as compared to the businesses/development investment focused model.

Decision makers need to understand the value of ecosystem services because this is the whole picture and a way for citizens and decision makers to analyze whether or not the Project should proceed. It is the role of the EIR to explain that ecosystem services are received at no cost and yet they do have a monetary value, which is a generally understood point of reference. Additionally, the DEIR is responsible for explaining that ecosystem services benefit the whole community whereas the benefits of the Project accrue to a few. The community welfare (sequestered carbon) is reduced for a promise of future investment capital, which will not be shared across the community as equally as the farmland values were.

71-21

The DEIR’s failure to monetize the value of natural systems does not give the public and decision makers all the information necessary to understand, in a holistic way, the impact of the Project. Failure to monetize environmental values also erases the value these natural systems contribute to our quality of life. It is not a one snap shot valuation, because natural systems continue to benefit the community and add community value in perpetuity.

When an environmental service, such as farmland, is lost, the economic analysis of what will replace the farmland should consider the value of the loss of future carbon sequestration and cost of the release of a lifetime of stored carbon, the human value of enjoyment of open space and the value accruing to the web of life, of which we are a part. These are quantifiable values.

**Conclusion:**

In circumstances like this, when all available and feasible mitigation measures have been identified, but are inadequate to reduce an environmental impact to a less-than-significant level, CEQA states that the County may not simply proceed with a finding of overriding consideration. First, the County must determine that all feasible mitigation to substantially lessen the significant effects of the Project have been analyzed.

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To that end, the Alliance for Environmental Leadership put forward the Citizen Initiated Smart Growth Plan (CISGP), which we believe substantially reduces significant environmental impacts and is environmentally superior and therefore, the County is obligated to analyze the CISGP as a Project alternative.

The Citizen Initiated Smart Growth Plan achieves County Goal and objectives as set forth in the DEIR. It provides comparable business and industrial opportunity to the proposed Project through a spectrum of industrial mixed-uses that locate residences adjacent to the highest employment density in such a way that fosters community synergy. The CISGP is designed as an innovation ecosystem -providing 49,613 multi-family housing units of various typologies designed so that businesses, students and 145,000 workers are living and working in proximity for the purpose of collaboration and meeting high quality of life measures. The CISGP produces a jobs housing ratio of 3:1, as compared to the 22:1 Project jobs housing balance. In addition, a higher density of housing dramatically reduces environmental impact per capita, makes rapid bus transit possible and reduces GHG emissions by 75%. The CISGP moves the University outside of the one mile MRF smell “buffer”, to an infill site where project feasibility improves, infrastructure is in place to support University development and where students will readily engage with businesses and contribute meaningfully to the innovation ecosystem. In summary, the CISGP should be analyzed as a Project alternative because it is an opportunity for Placer County to establish a future forward innovation community and achieve the objectives identified in the County’s DEIR without significant adverse environmental effect.

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cont.

I urge you to recirculate this DEIR, because the Proposed project lacks a revenue source and would result in severe environmental degradation. Recirculation would ensure that decision makers and the public are given the opportunity to analyze the environmentally superior CISGP. Our common goal is a thriving SA, regional benefit and generating revenue to fund countywide services.

Please insure that public comments appear verbatim in the DEIR. Thank you for the opportunity to provide comments on the DEIR, for your consideration of my request that the DEIR be recirculated and for your consideration of the CISGP.

Sincerely,

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**Letter** | Leslie Warren  
**71** | February 22, 2019

- 71-1 The comment expresses concern that a fiscal/economic impact study was not included in the EIR. A market study was completed and has been available on the County’s website for public review, including during the Draft EIR public review period. A copy of the market study can be found at [www.placer.ca.gov](http://www.placer.ca.gov) under the Community Development and Resource Agency webpage. Also, see responses to comments 56-6 and 56-9 regarding financial feasibility.
- 71-2 The comment requests verification that the economic benefits cited are accurate, whether the County would receive repayment for the cost of funds to process the application, and whether urban decay would exist. The economic impact analysis cited by the commenter was provided to the County by the property owner. The County has not engaged a separate entity to conducts its own analysis. The County has entered into an MOU with the property owner, which states in Section D that property “Owner shall be responsible for the reasonable costs associated with the PRSP applications...the parties agree to negotiation good faith the apportionment of costs the will be reimbursed to the County through the establish of a Placer Ranch Specific Plan Fee.” The PRSP fee is included within the Development Agreement for the PRSP. This comment is primarily focused on economic/financial issues and does not raise issues related to environmental impacts. The only exception is the issue raised related to urban decay. The Draft EIR evaluates the potential for urban decay in Section 4.10, “Land Use.” See Impact 4.10-4, “Economic or social changes resulting in physical environmental changes,” which starts on page 4.10-19. The Draft EIR’s analysis is based on an Urban Decay Analysis prepared by EPS in 2018. The Draft EIR concludes on page 4.10-22 that:

The project would not result in an oversupply of any land use within the market it would serve and compete with (i.e., Retail Market area, office and Industrial market area). Demand would support additional retail space developed as part of the proposed project. When considering other planned development, there would not be an oversupply as retail would be phased in response to adequate market demand. Even if businesses close, there is an economic incentive for owners to maintain properties and a probability that properties could be re-tenanted or repurposed for another use. Additionally, jurisdictions have ordinances and code enforcement tools to prevent and address blight. There would be no impact related to urban decay.

- 71-3 The comment asserts that the Draft EIR fails to describe the nature of the project site in the project description. The comment suggests that the Draft EIR does not include information related to the natural systems contained on the project site, including soil types, edge conditions, hydrology and seasonal functions. The comment notes that this information is needed in order for the public and the decision makers to conduct meaningful review and make conclusions about the project's impacts.

Each section of the Draft EIR's environmental analysis includes a discussion called "Environmental Setting" wherein the existing physical conditions (at the time the NOP was released) of the project area are described. With respect to the issues identified in the comment, Section 4.9, "Hydrology and Water Quality," of the Draft EIR provides an overview of the environmental setting on site, including disclosure of information related to the site's hydrology and water quality resources. This section describes seasonal functions related to the site and edge conditions related to hydrology and water quality. In addition, Section 4.6, "Geology and Soils," of the Draft EIR provides an overview of the environmental setting on site as well. This section describes geologic conditions, topography, soils, erosion potential, expansive soils, mineral resources, and paleontology site. This environmental setting constitutes the baseline physical conditions by which the County determines whether an impact is significant, consistent with CEQA requirements. Mitigation is identified to reduce potentially significant and significant impacts. Where mitigation is unavailable or available but unable to reduce impacts to below the thresholds of significance, impacts are determined to be significant and unavoidable. Thus, contrary to the commenter's assertion, existing environmental conditions on the project site are described in the Draft EIR, allowing the public and decisionmakers to conduct a meaningful review and make conclusions about the project.

- 71-4 The comment states that the West Placer Prairie area supports the second highest density of migratory raptors. The comment does not provide a source for this information and does not identify the location of the area it refers to as the West Placer Prairie or provide a definition or description of West Placer Prairie or the ecological parameters that characterize West Placer Prairie. West Placer Prairie is not an area or habitat type identified in Placer County planning documents, the PCCP, the USFWS's vernal pool recovery plan, or resource agency documents and is not a vegetation or habitat type defined in any standard vegetation or habitat classification system routinely used in California, such as the *Manual of California Vegetation* (Sawyer et al. 2009) or California Wildlife Habitat Relationships system. It is not a natural community included on CDFW's current list of vegetation alliances, associations, and special stands. Therefore, these comments that apply to a resource that is not defined spatially or ecologically cannot be further addressed.

The comment also states that the Draft EIR does not analyze the effects of light pollution on migratory waterfowl that use the SAP area for forage and rest, or on migratory raptors, particularly owls, that rely on darkness to locate and secure prey. The comment further suggests the Draft EIR should analyze light pollution impacts on amphibians in wetland habitats within and adjoining the SAP area and on nocturnal mammal activities such as hunting and reproductive activity.

Upon SAP buildout, foraging habitat would be primarily absent in the developed areas where lighting would occur, so lighting would not interfere with raptor foraging (which would occur primarily in the undeveloped areas). Likewise, the vernal pool grassland complexes that provide stopover resting and foraging habitat for migrating waterfowl would be removed within developed portions of the net SAP and PRSP areas, so there would be no waterfowl resting or foraging within these developed

areas that would be affected by light pollution from project development. The remaining vernal pool grassland complexes would be located primarily in preserve/mitigation reserve land uses where no lighting would be located. Consistent with Policy 1.0.9 of the County General Plan, which discourages the use of outdoor lighting that shines unnecessarily onto adjacent properties or into the night sky, SAP Policy LU/ED-3.9: "Lighting" requires that lighting in SAP developments be designed to minimize projection into adjacent properties and onto adjacent roads and not provide a source of glare and that lighting in parking areas not exceed 18 feet in height. The proposed SAP Corridor Design Standards and Guidelines (page 4.1-16 of the Draft EIR) require that all lighting shall be Dark Sky compliant, all lighting should utilize cut-off type fixtures to minimize glare and visibility from adjacent areas, and should be the appropriate size and height given the activities for which they are designed; and signage lighting should be designed appropriately to not create hazardous glare. Therefore, light trespass into adjacent preserve/mitigation reserve lands would be minimal and would not discourage wildlife from using those areas and performing their normal feeding and reproductive behaviors, would not interfere with raptor foraging in those areas, would not interfere with bird migration, and would not reduce amphibian or mammal species survival or reproduction.

Also, see response to comment 52-2 for a discussion of impacts to human health and wellbeing resulting from light pollution.

71-5 The comment raises issues regarding farmland conversion and associated mitigation measures identified in the Draft EIR. See responses to comments 12-11 and 52-24 regarding the project's farmland conversion impact and accompanying mitigation measures. It is important to note that the Draft EIR considers this impact significant and unavoidable after implementation of the mitigation measures.

The comment also raises issues with land used for habitat conservation being used also for farmland mitigation. See response to comment 52-24, which addresses this issue.

The comment also includes a list of issues related to the adequacy of the Draft EIR. These are identified below with responses provided for each (some responses combine multiple bulleted items).

▲ Cumulative loss of farmland as it relates to State GHG reduction goals.

As discussed under Mitigation Measures 4.2-1a and 4.2-1b on page 4.2-14 of the Draft EIR, all converted Farmland would be compensated on either a 1:1 or 1.35:1 acre basis. Further, the State's GHG reduction goals include all sectors of emissions, for which agriculture accounts 8 percent (CARB 2019). As discussed under Impacts 4.7-1 and 4.7-2 of the Draft EIR, the analysis considers the State's ability to meet its GHG targets. These targets are set based on a comprehensive GHG emissions inventory provided by the CARB and does not provide targets based on individual emission sectors.

▲ Loss of carbon sequestration (including cumulative loss).

Implementation of the project would convert existing grassland to urban development. Annual accumulation of carbon dioxide (CO<sub>2</sub>) per acre of grassland is approximately 4.31 MTCO<sub>2</sub> per year (CAPCOA 2016), which would be a total loss of 36,622 MTCO<sub>2</sub> per year. (Note that this is a gross estimate and does not consider the areas of the project site that would be preserved.) However, while much of the grassland would be converted to development, there would be a substantial amount of tree planting that has a much higher CO<sub>2</sub> accumulation rate of 111 MTCO<sub>2</sub> per acre per year (CAPCOA 2016). Considering an acre of trees would be approximately 78 trees (U.S. Department of Agriculture Forest Service 2016), the project would need to plant a minimum of 12,092 trees to match the carbon sequestration of the existing grassland. This would be about 1.4 trees per acre of the project, which would mean very sparse tree shading. It is more probable based on Placer County Landscape Design Guidelines and SAP and PRSP policies that far more trees would be planted over the project area. Thus, there would be a net benefit of carbon sequestration from tree planting than existing grasslands at the project site.

▲ GHG released from soils during construction.

The amount of carbon held in soil that may be disturbed during project construction is unknown, as it is site-specific and depends on a balance between incorporation and release mechanisms (CARB 2015). There are no models approved by Placer County, PCAPCD, or the CARB that provide methodology to conduct such a calculation. See the response above for an estimate of carbon storage in grasslands, the primary vegetation type in the project area.

▲ Difference in GHG emissions between urban and agricultural uses.

The GHG emissions estimate for the project conservatively assumes that there is no existing land use that emits GHGs at the project site. However, agricultural land uses in Placer County resulted in approximately 268,341 MTCO<sub>2e</sub>/year in 2005 (Placer County 2018). There was approximately 126,221 acres of agricultural land in Placer County in 1994 (Placer County 1994). While a direct comparison is not possible based on available data, the agricultural GHG intensity per acre would result in approximately 2.13 MTCO<sub>2e</sub>/acre/year. Based on the total acreage of the project (8,497 acres), the project site would emit 18,064 MTCO<sub>2e</sub>/year. Thus, the analysis presented in the Draft EIR is a conservative estimate of emissions because it does not discount the existing emissions associated with agricultural uses in the project area.

▲ Impact resulting from sea level rise.

As discussed under Impact 4.7-3 of the Draft EIR, sea level rise is not an anticipated climate change impact on the project area. The project would be at a minimum elevation of 100 feet above sea level. According to Cal-Adapt, a climate change scenario planning tool developed by the California Energy Commission, Placer County is not in any area of California that is anticipated to experience the effects of sea level rise (CEC 2019). No revisions to the Draft EIR are needed as this potential impact has been dismissed.

71-6 The comment states that the Draft EIR does not establish a time frame for mitigation monitoring and does not explain how the County would enforce mitigation or fund monitoring. Regarding enforcement and monitoring, Placer County includes all mitigation measures from a project's environmental review document in the project's Conditions of Approval (COAs). The County's Environmental Review Committee collaborates with, and is typically the same review staff for, the County's Design Review Committee (DRC) to ensure the COAs are enforced throughout project improvement plan review, construction, final map recordation, and operation, as appropriate. Satisfaction of the COAs is monitored and tracked via the improvement plan review process electronic filing system, as well as the County's electronic permit tracking system. Improvement plans are sent by the Engineering and Surveying Division (ESD) to all reviewers, including but not limited to Planning Services, Environmental Health, Air Quality, Fire, and the Department of Public Works divisions of Parks, Environmental Engineering, and Transportation, with review and signoff from each reviewer required prior to improvement plan approval. Progression through the improvement plan approval and construction process is dependent on satisfaction of the project's COAs. Planning Services staff attend ESD's mandatory pre-construction meetings with the project owner, engineer, and contractor to ensure COAs and mitigation-measure protections are in place prior to any grading activities commencing. In addition, County inspectors have the authority to shut down construction activities if COAs are not being properly satisfied. The County's monitoring and tracking of compliance with the COAs/mitigation measures are funded by the developer as part of the improvement plan review and construction inspection process. Project construction is not accepted as complete by the County until all DRC reviewers and outside agencies have signed off on the improvements.

The comment does not specify which mitigation measures lack a time frame for monitoring or mitigation enforcement mechanisms. However, mitigation measures identify implementation timing and enforcement responsibilities. Mitigation Measure 4.4-1a, for example, requires monitoring for a

minimum of 5 years from completion of mitigation, or human intervention (including recontouring and grading), or until the success criteria identified in the approved mitigation and monitoring plan have been met, whichever is longer. Many of the mitigation measures include participation in the PCCP as an option. If the PCCP is adopted and available as a mitigation strategy, the project proponent would pay mitigation fees that would fund land acquisition, mitigation projects that protect, enhance, and restore habitat, and long-term management and monitoring within the PCCP Reserve Acquisition Areas. The future Placer Conservation Authority (PCA) would oversee the implementation of the PCCP. If the PCCP is not available as a mitigation strategy, purchasing credits from an agency-approved mitigation bank would be another mitigation option. Mitigation banks are required to meet success criteria demonstrating ecological function to the resources agencies before they can be approved to sell credits. Other mitigation options include agency-approved in-lieu fee funds or land dedication, or permittee-responsible habitat establishment, reestablishment, or enhancement. Depending on the affected resource for which mitigation is sought, a state or federal agency (e.g., USACE, USFWS, or CDFW) may be consulted during development of mitigation and monitoring standards and may share responsibility for enforcing mitigation requirements with the County as specified in each mitigation measure. Permittee-responsible mitigation would require development of a compensatory habitat mitigation plan that describes performance standards to ensure success, remedial actions to be implemented if performance standards are not met, a detailed monitoring plan, and reporting requirements. Project proponents would be required to submit monitoring reports to the County that document performance standards and success criteria. The project proponent is responsible for funding mitigation and monitoring required for their respective projects, not the County. The *Proposed Placer Ranch Specific Plan Development Standards* listed on page 4.4-34 of the Draft EIR require a long-term management plan and funding mechanism be established for the preservation of the open space preserves.

The comment erroneously states the Draft EIR did not analyze project impacts on aquatic habitat in the four conservation and mitigation banks in the northern portion of the SAP area. Indirect impacts on aquatic habitat in preserve/mitigation reserve as well as on adjacent parcels are addressed under Impact 4.4-1 and Impact 4.4-3. As stated on page 4.4-36 of the Draft EIR: “In addition to these direct losses, aquatic resources retained within or adjacent to developed land uses could be indirectly affected by grading, trenching, and creation of impervious surfaces proposed for adjacent uplands and encroachment of developed land uses. Potential indirect effects include reduction in water quality caused by urban runoff, erosion, and siltation; increased pollution, including litter and dumping and noise and light pollution; alteration of hydrologic regime through modification of surface flows or perched groundwater flows; intrusion of humans and domestic animals; changes in management regimes, such as elimination of grazing; and introduction or spread of invasive species that could result in habitat degradation. Implementation of the SAP policies would reduce the potential impacts on water quality and hydrologic regime; however, indirect effects would still occur and would diminish habitat quality and function for most species that currently use these aquatic habitats because of the encroachment of developed land uses.”

On page 4.4-44 of the Draft EIR, it is noted that: “In addition to the direct removal of habitat, implementing the net SAP could have indirect impacts on vernal pool type wetlands, as described under Impact 4.4-1. USFWS (and the draft PCCP) generally considers that vernal pool habitats within 250 feet of lands that would be developed may be subject to indirect effects unless site-specific analysis of terrain and hydrologic barriers demonstrates the immediate watershed is smaller than 250 feet around the wetland.”

Mitigation for indirect impacts is offered on page 4.4-47, including: “No project construction shall proceed in areas supporting potential habitat for Federally listed vernal pool invertebrates, or within adequate buffer areas (250 feet or lesser distance deemed sufficiently protective by a qualified biologist with approval from USFWS), until a BO and incidental take authorization has been issued by USFWS and the project proponent has abided by conditions in the BO, including all conservation and minimization measures.” and “The project proponents shall preserve acreage of vernal pool habitat

for each wetted acre of any indirectly affected vernal pool habitat at a ratio approved by USFWS at the conclusion of the Section 7 consultation. This mitigation shall occur before the approval of any grading or improvement plans for any project or phase that would allow work within 250 feet of such habitat, and before any ground-disturbing activity within 250 feet of the habitat.”

- 71-7 The comment states that the Draft EIR falsely dismissed special-status fish species and did not adequately analyze the effects of the Pleasant Grove Retention Facility construction on fisheries, including threatened and endangered fish species.

The comment is incorrect that construction of the Pleasant Grove Retention Facility would remove all riparian vegetation within the facility and that it would channelize 3,900 feet of Pleasant Grove Creek. The retention facility plan would create a 3,900-foot-long high-flow bypass channel (Creekview Bypass Channel) running parallel to Pleasant Grove Creek. The bypass channel would be constructed in accordance with the *City of Roseville Creekview Specific Plan* and is necessary to collect flows from Pleasant Grove Creek, upstream of the basin, for discharge into the facility during storage events. The bypass channel would be created primarily through annual grassland habitat, but the area also contains seasonal wetlands and swales, as discussed on page 4.4-39 of the Draft EIR. Temporary construction impacts to marsh and riparian habitat would occur in areas where weirs and culverts would be constructed in the bank of Pleasant Grove Creek to allow flow exchange between the creek and the bypass channel during high flow events. As also noted on page 4.4-39, creation of these structures would result in hydrological interruption and modification. However, the hydrological modifications would be designed to maintain pre-project stream flows by diverting high flood flows into the retention facility. A low-flow return channel would be built to convey low flows back to the creek at a rate that mimics pre-project flow rates. Therefore, creation and operation of the retention facility would divert high flows but would not alter low flows in Pleasant Grove Creek such that an adverse effect on fisheries, including threatened or endangered fish, would occur.

The Draft EIR discloses pages 4.4-57 and -58 the potential indirect impacts on Central Valley steelhead and Chinook salmon that may result from construction of the retention facility. While the project would be required to implement erosion control BMPs, protect against sediment contamination of streams, and prevent spills and leaks of hazardous materials from construction equipment, the County would have no ability to enforce environmental compliance for this project within the City of Roseville. Therefore, potential indirect effects of project-related construction on steelhead and Chinook salmon habitat resulting from the Pleasant Grove Retention Facility would be significant and unavoidable though the County would coordinate with the City of Roseville regarding mitigation and compliance.

As described on pages 4.4-55 and 4.4-56 of the Draft EIR, Central Valley steelhead—the only threatened fish species in the area—is currently known to be present in the Bear River, Raccoon Creek, Auburn Ravine, and Dry Creek (including Secret Ravine and Miner’s Ravine tributaries). Streams in the project area are not considered occupied by steelhead (NMFS 2014) or Chinook salmon, and suitable aquatic habitat for these species is not present. Orchard Creek in the net SAP area is hydrologically connected to occupied habitat for steelhead and Chinook salmon, and critical habitat for steelhead (migration and/or rearing habitat), outside the net SAP area in Auburn Ravine, approximately 0.75 mile north of the northern SAP boundary (at its closest point). Also, the tributary to Pleasant Grove Creek in the southeast portion of the SAP area is hydrologically connected to Cross Canal, which is also connected to Auburn Ravine. Therefore, construction and land uses proposed under SAP that may affect in-stream water quality and habitat could potentially result in indirect effects on steelhead and Chinook salmon habitat downstream of the SAP area. Potential indirect effects on downstream fish habitat include reduction in water quality caused by erosion, and siltation, contamination in stormwater returned to the creek, and hydrologic modification through increased runoff volumes and velocities. Construction activities could lead to contamination of stormwater flows (sedimentation) and potential degradation of downstream surface water quality and fish habitat. It is also described on page 4.4-55 of the Draft EIR that SAP policies and Placer County

permit conditions, as well as state and federal water quality laws and regulations would require measures to protect downstream water quality and fish habitat. Therefore, potential indirect effects of project implementation on special-status fish habitat outside the SAP area would be less than significant.

- 71-8 The comment states that the Draft EIR fails to survey for threatened or endangered insect species, consider how removal of West Placer Prairie would affect insect populations, and analyze how cumulative loss of pollinator habitat would impact regional farm production and food supply.

See response to comment 71-4 regarding West Placer Prairie; because this is not a resource that is defined ecologically or spatially, no further response can be provided. As identified in Table 4.4-3 of the Draft EIR, valley elderberry longhorn beetle is the only state or federally listed threatened or endangered insect species that has potential to occur in the SAP area and impacts to this species are addressed under Impact 4.4-4. Mitigation for potential impacts to valley elderberry longhorn beetle, including requiring surveys for valley elderberry longhorn beetle habitat, are presented in Mitigation Measures 4.4-4a and 4.4-4b. With regards to global declines in insect abundance, any analysis of the project's potential contribution would be highly speculative because this is a recently discovered phenomenon, the causes of which have not been systematically studied and identified. Furthermore, the regional status of general insect population numbers has not been studied comprehensively so there is no baseline data for the cumulative condition. Likewise, there is no evidence that establishes any particular importance of the SAP area as a source of pollinators for regional farm production and food supply or for the baseline cumulative condition of pollinators with regards to farm production.

- 71-9 The comment states that mitigation measures for special-status species are inadequate and require that a qualified biologist relocate species found during surveys. The comment uses western pond turtle as an example saying the Draft EIR should mitigate impacts to eggs by prohibiting construction in suitable habitat during the nesting, incubation, and hatching season.

Relocation of species found during surveys is only allowed for certain special-status species. Relocation of western spadefoot is an element of the mitigation strategy for this species and would be used to minimize mortality of western spadefoot in areas that would be developed. Compensation for loss of vernal pool complex habitat is another element of mitigation for this species (Mitigation Measure 4.4-3b).

Mitigation Measure 4.4-5a requires preconstruction surveys for western pond turtle in areas of suitable aquatic habitat as well as upland habitat within 200 feet of aquatic habitat that may be used for nesting. To clarify that the mitigation measure is intended to protect eggs and hatchlings as well as adult turtles, the mitigation measure for western pond turtle on page 4.4-59 of the Draft EIR is revised as shown in response to comment 16-5.

- 71-10 The comment expresses appreciation that the Draft EIR provides Mitigation Measure 4.4-8 to create wildlife crossings over and under Placer Parkway but notes the Draft EIR fails to provide similar protection for human population movement. The SAP and PRSP include design features to allow for appropriate pedestrian movement throughout the project area. Unlike wildlife, humans understand the danger of roadways and are able to use features such as walk signals and cross walks to safely cross even busy roads; therefore, specialized crossings beyond these typical features are not normally required for humans. Traffic hazards, including pedestrian and bicycle safety, are evaluated in Section 4.14, "Transportation and Circulation," of the Draft EIR. Specifically, Impact 4.14-14, "Impacts to bicycle and pedestrian facilities," evaluates this issue and concludes that the impact would be less than significant.

- 71-11 The comment suggests that the GHG emission analysis does not account for heavy truck trips to the industrial and commercial land uses proposed under the project. The mobile-source GHG emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.1, as

explained on page 4.7-12 of the Draft EIR. CalEEMod estimates mobile-source emissions using trip lengths and trips rates, which were modified to match the results of the traffic analysis for the project, along with a fleet mix based on the project's location. In this instance, the fleet mix consisted of 79 percent of light-duty (i.e., passenger) vehicles and 21 percent of heavy-duty vehicles (i.e., trucks and buses). This data can be found in the CalEEMod results shown in Appendix K of the Draft EIR.

The comment also claims that the Draft EIR does not address the potential idling of heavy-duty trucks and associated emissions. Mitigation Measure 4.3-3a includes a requirement that all truck loading/unloading docks have power outlets to support the use of auxiliary equipment rather than idling. Additionally, signage would be posted at each loading dock that requires diesel engine idling to a maximum of 5 minutes, which is consistent with PCAPCD guidance and CARB's Airborne Toxic Control Measure set forth in CCR Title 13 Section 2485.

The comment expresses concern over potential health effects from industrial and commercial sources on nearby sensitive receptors. Impact 4.3-5 discusses the potential health risk and exposure of sensitive receptors to toxic air contaminants. Mitigation Measure 4.3-5a would reduce exposure of sensitive receptors to truck loading areas through setback requirements or the preparation of a site-specific health risk assessment showing that the associated level of cancer risk at sensitive receptors would not exceed 10 in one million. Additionally, Mitigation Measure 4.3-5b would reduce exposure of sensitive receptors to vehicle traffic on freeways through setback requirements. Also see the Friant Ranch discussion included in Chapter 2 of this Final EIR which provides clarification regarding potential health impacts for ozone precursors. No revisions to the Draft EIR are necessary.

71-12 The comment claims that the Draft EIR does not analyze the potential heat island effects from the proposed land use development. There is no available methodology to quantify the potential surface temperature increase due to the density of the buildings and land uses constructed under the project, as this requires air temperature measurements at the site where buildings already exist. Because the project is not yet built, these measurements cannot be taken to address project-specific impacts to heat island effects. Without this data, it is not possible to estimate potential increase in electricity demand for building cooling and its associated GHG emissions. Although energy consumption and associated GHG emissions cannot be quantified from heat island effects, there are several SAP policies and design guidelines intended to reduce the heat island effect, including:

- ▲ SAP Policy NR-5.9: Cool Community Strategies, which states, "The County shall promote Cool Community strategies to cool the urban heat island, reduce energy use and ozone formation, and maximize air quality benefits by requiring new development to implement four key strategies: plant trees, selective use of vegetation for landscaping, install cool roofing, and install cool pavements.
- ▲ SAP Corridor Design Standards & Guidelines, which states the project should, "Use light-colored paving surfaces to reduce urban heat island effect."

Mitigation Measure 4.7-2a of the Draft EIR requires "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." Thus, cool roofs would be included on all project buildings.

Because potential heat island effects would be mitigated through the policies and mitigation measures listed above, no additional revisions to the Draft EIR are required.

It should also be noted that the comment's claim that, at buildout, the SAP would be 83 percent parking lots and roadways and 17 percent structures (i.e., 100 percent impervious surfaces) is a clear overstatement, given the large areas of land protected under the Mitigation/Preserve designation and the policy requirements for open space and setbacks from creeks and wetlands.

The PRSP also includes substantial areas of open space. Landscaping requirements are also included in the SAP and PRSP, which would require vegetative cover (as opposed to impervious surfaces).

- 71-13 The comment states the Draft EIR fails to indicate whether Placer County has achieved its fair share of regional housing needs. The comment further suggests the Draft EIR did not analyze the effect of the jobs to housing ratio on housing prices, VMT, and GHG. Finally, the comment states the Draft EIR does not establish whether school districts would provide will-serve letters to operate schools within 1 mile of the landfill.

The Draft EIR indicates buildout of the SAP is estimated to support development of 55,760 new jobs and 8,094 new dwelling units. This translates into a jobs-housing ratio of about 7:1, rather than the jobs-housing ratio of 22:1 identified in this comment.

As described in Section 4.12.2 of the Draft EIR, the SAP/PRSP would aid Placer County in achieving the County's obligation to provide enough land with densities to accommodate the County's assigned fair share of the region's housing needs in accordance with General Plan Housing Element Policies B-4 and B-15, which require 10 percent of the housing inventory within the Specific Plan to be restricted to affordable rates, and constructed within the project area.

Draft EIR Section 4.12.2 further identifies a jobs-to-housing ratio of 1.5 is considered balanced for purposes of minimizing commuting in or out of the community for employment opportunities. (It is worth noting, that approximately 70 percent of South Placer residents commuted to locales outside of the area.) The Draft EIR accurately analyzed that if the project area was built out today it would increase the unincorporated County's jobs-to-housing ratio from 1.08 to 1.36, which is generally considered balanced, and therefore could result in fewer vehicle trips generated by commuting employees.

The intent of the project is to develop a regional center for high-quality employment, entertainment, and education. The project presents an opportunity to achieve better balance between local jobs and the local workforce. The predominantly residential areas surrounding the project house a highly skilled labor force that would find new opportunities for employment in the project.

The project's planned housing options are intended to meet different segments of market demand. In addition, numerous specific plans and other infill projects are being planned in the cities of Lincoln, Roseville, and Rocklin, and the unincorporated county, adding substantial new single-family and multifamily residential development typologies to the South Placer market adjacent to the project.

Regarding school "will-serve" letters, Section 8, "Public Services," of the PRSP describes anticipated student generation rates and designated future school facilities within the project area, and the school sites identified on the land use plan are reserved for the Roseville City School District and the district is responsible for planning each school's facilities and determining construction timing. As discussed in Section 4.13, "Public Services," of the Draft EIR, future development, including a new elementary school and new middle school, would comply with Placer County General Plan policies, including Policy 4.J.11 that requires developer coordination with school districts to ensure that needed education facilities are available for use in a timely manner.

- 71-14 The comment suggests that the proposed mitigation for library facilities (Mitigation Measure 4.13-4) is inadequate as it is discretionary and subject to developer initiative and suggests that mitigation should impose fees upon the developer and establish a funded plan to build a library. Mitigation Measure 4.13-4 requires developers to create or annex into an existing CFD or CSA Zone of Benefit (or combination). The measure specifically states that the chosen mechanism *shall* include a landowner-approved special tax of *an adequate amount*, or other financing mechanism acceptable to the County, to *ensure* that a funding mechanism for library services is in place to provide

adequate library services to the net SAP area and PRSP area are during all stages of development [emphasis added]. This funding is required by Mitigation Measure 4.13-4. It is not discretionary. Also, as described in the Draft EIR (page 4.13-34) a regional library is already planned as part of the Placer Vineyards Specific Plan to serve the west Placer County region, including the project area. Therefore, development of an on-site library to serve only the project would not be consistent with long-range plans for library services in the area. Note that the County has revised Mitigation Measure 4.13-4 to require additional interim library service. See Chapter 2, "Revisions to the Draft EIR," for the revised mitigation measure text.

71-15 The comment asserts that the Draft EIR does not address the effect of heavy truck trips on the health and safety of bicyclists and pedestrians. The comment also asserts that the Draft EIR does not analyze how dedicated and separated bicycle and pedestrian paths could reduce VMT on major thoroughfares. The comment suggests that the Draft EIR evaluate how pedestrians and bicyclists would safely cross major roadways, and suggests grade separated pedestrian crossings be considered. Impact 4.14-14 in the Draft EIR describes the bicycle and pedestrian facilities that would be provided along roadways in the net SAP and PRSP areas. It notes that shared-use paths are proposed along major vehicular routes, such as Foothills Boulevard, Fiddymont Road, and Athens Avenue, which would provide a dedicated facility for bicyclists and pedestrians that is separated from vehicular traffic. The SAP also requires Class II bicycle lanes on all other roadways as illustrated in SAP Figure 2-2 Bike and Pedestrian Mobility Map. Furthermore, the Draft EIR acknowledges that the SAP addresses the potential barrier of Placer Parkway by promoting grade-separated pedestrian and bicycle connections across Placer Parkway. At local at-grade intersections, marked crosswalks would be provided to facilitate safe pedestrian crossings. The planned bicycle and pedestrian facilities in the SAP are intended to provide dedicated routes that would protect the health and safety of cyclists and pedestrians.

71-16 The comment states that the SAP does not provide comprehensive transit access both to support transit travel and as a mitigation for significant impacts. The comment asserts that none of the project alternatives are sufficient to support a vigorous bus system supported by higher density development. The comment also asserts that the capacity-expanding mitigation for LOS impacts identified in Mitigation Measures 4.14-16 through 4.14-20 would not relieve traffic congestion but would increase traffic congestion. Impact 4.14-13 in the Draft EIR acknowledges that the SAP and PRSP would provide transit-supportive land uses and infrastructure. This includes high-density residential, commercial mixed-use, and campus park land uses in proximity to major transportation corridors and potential transit stops. Furthermore, the PRSP includes bus turnouts and shelters at frequent locations along arterial roadways to serve transit riders. Mitigation Measure 4.14-13a commits the County to preparing a transit master plan for the net SAP and PRSP areas that adequately serves transit demand in the SAP. This transit master plan may identify multiple fixed-route bus lines to serve the SAP area, beyond the one BRT line discussed on pages 4.14-36, 4.14-39, and 4.14-91 of the Draft EIR. Mitigation Measure 4.14-13b requires that the County also establish a funding mechanism to fund the transit service identified in the transit master plan.

Even with this transit service, project vehicle trips would generate significant impacts to traffic operations as disclosed in Impacts 4.14-16 through 4.14-20. The Draft EIR is required to identify feasible mitigation to reduce the severity of these traffic impacts. In most cases, intersection/roadway widening to adequately serve the forecasted traffic demand is a feasible mitigation measure to reduce the traffic delay. The comment acknowledges this fact when stating that increases in roadway capacity cause a decrease in travel time (i.e., a decrease in congestion).

71-17 The comment states that the Draft EIR does not evaluate whether Pioneer Community Energy's policies and procedures adequately protect citizen ratepayers from subsidizing future occupants of the project area. The Draft EIR has been revised to provide minor clarifications with respect to Pioneer Energy. See Chapter 2, "Revisions to the Draft EIR." These minor changes did not alter any of the conclusions of the Draft EIR.

71-18 The comment disagrees with the conclusion of Impact 5.15-11 regarding impacts on the WRSL from incompatible uses and states that the Draft EIR fails to discuss the correlation between public complaints and distance to odor sources. The comment also notes that the Draft EIR does not address the County's own legal action to protect the MRF buffer in 1997.

Because odor issues relate to different types of potential environmental impacts, odor-related impacts are addressed in three different sections of the Draft EIR: 4.3, "Air Quality"; 4.10, "Land Use"; and 4.15, "Utilities." Impact 4.15-11 focuses on the project's potential to adversely affect operation of WPWMA facilities. The comment's criticisms of Impact 4.15-11 related to distance to sensitive receptors are addressed in Impact 4.3-6, which is part of the Draft EIR's air quality analysis, and Impact 4.10-2, which is part of the Draft EIR's land use analysis. Also see Master Response 4: Odors.

The commenter also indicates that the Draft EIR did not address the previous court case related to the landfill buffer. California Resources Agency website provides the following summary of the case, *Placer Ranch Partners v. County of Placer*, Cal.App.3d (2001):

Developers filed a petition for a writ of mandate challenging the county's certification of a final environmental impact report concerning the county's general plan update. Plaintiffs claimed that the environmental review did not meet the requirements of the California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.), and that the county acted arbitrarily in prohibiting residential development within one mile of the county's landfill. The trial court denied the petition. (Superior Court of Placer County, Nos. SCV-2519 and SCV-2828, James D. Garbolino, Judge.)

The Court of Appeal affirmed, holding that the county's decision regarding the one-mile buffer zone around the landfill was supported by substantial evidence. The court held that the question on appeal was not whether the buffer zone was necessary or whether a smaller zone would adequately accommodate the conflicting land uses; rather, the question was simply whether the propriety of the one-mile zone was a fairly debatable question, upon which reasonable minds could differ. The court held that the county's decision regarding the size of the buffer zone was supported by substantial and relevant evidence, even though no scientific evidence was presented on the issue. (Opinion by Hull, J., with Blease, Acting P. J., and Callahan, J., concurring.) (California Resources Agency 2019)

As described, the decision did not center around the specific buffer distance, or the need for the buffer itself; it focused on whether reasonable minds could differ about the need for the buffer and the identified one-mile buffer distance and whether the County's decision was supported by substantial evidence.

71-19 The comment requests a list of all fees, special districts, special taxes, and assessments proposed as mitigation. A financial plan has been prepared for the PRSP and will be available for the Board of Supervisors deliberations. This comment does not raise issues related to environmental impacts.

71-20 The comment reflects fiscal concerns. The suggestion that the PCCP fees for the SAP/PRSP would be \$40 million are inaccurate. See response to comment 56-6.

Costs to participate in the Pleasant Grove Retention Basin would be negotiated with the City of Roseville as the basin is owned by the City of Roseville. Section 2.3, "Required Permits and Approvals," of the Draft EIR states that an "agreement with City of Roseville for outlining fair-share obligations for off-site retention at the Pleasant Grove Retention Facility" would be required. Master Response 6, "Drainage and Flooding" and Master Response 9, "Mitigation and Development Fees" provide additional detail regarding the funding and timing of the Pleasant Grove Retention Basin.

Regarding GHG offset program feasibility, see response to comment 12-12. See response to comment 71-9 regarding a financial plan.

71-21 The comment states that the Draft EIR does not measure or evaluate the economic benefits of ecosystem services received from the natural environment (e.g., farmland, sequestered carbon, open space). Regarding economic impacts, 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 (including those related to public interests) and benefits of the project when making decisions regarding the project. The decision documents (including the CEQA Findings, which are described in response to comment 36-3) will provide the decisionmaker's detailed rationale on how the project would or would not serve the public interest.

71-22 The comment summarizes CEQA requirements for mitigation measures, but the summary is not entirely correct. See response to comment 54-1, which correctly describes CEQA requirements for mitigation measures. Also, see response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts, including the requirement for lead agencies to prepare findings and, if the project would result in significant and unavoidable impacts, a statement of overriding considerations. The Draft EIR identifies feasible mitigation measures to minimize significant impacts (see Table 2-1 in the Executive Summary for a summary of these mitigation measures). Additionally, this Final EIR evaluates the feasibility of additional mitigation measures suggested in written comments on the Draft EIR to further reduce significant impacts. Nonetheless, the Draft EIR identifies (in Section 5.1) those impacts that cannot be reduced to a less-than-significant level, even with mitigation.

PRC Section 21002 provides that “public agencies should not approve projects as proposed if there are feasible alternatives and/or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” The same statute provides that the procedures required by CEQA “are intended to assist public agencies in systematically identifying both the significant effects of projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.” Section 21002 goes on to provide that “in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.”

Thus, the commenter’s statement that the County must determine that all feasible mitigation measures have been analyzed is an explicit part of the CEQA process and, therefore, the County’s project approval process. Analysis of feasible mitigation measures is included in the Draft EIR, the Final EIR, and, if the project is approved, will be included in the CEQA findings.

Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, 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

**William Michael Wauters**

Letter  
72

Building Construction & Repairs  
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700 Clipper Gap Road  
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Chair and Members of the  
Placer County Planning Commission  
3091 County Center Drive #140  
Auburn, CA 95603

Attn: Shirlee Herrington, Environmental Coordinator **20 FEB. 2019**

Dear Ms. Herrington and Chair and Members of the Placer County Planning Commission:

I have reviewed the County's Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County:

**DOCUMENT DUMPING** - THE ROLL OUT OF THIS FAULTY DEIR WITH THE HUGE VOLUME OF PAPER AND SHORT TIME SHOWS EDU-EMPT FOR CITIZENS ATTEMPTING TO RESPOND.  
PLEASE - REVISE THE DEIR AND GIVE MORE TIME.

72-1

**COUNTY DECEPTIONS IN DEIR POWER POINT**  
Page 7: "CAPITALIZE ON PROXIMITY TO HWY 65, RAIL LINES," ...  
- THERE <sup>IS</sup> NO USAGE OF RAIL LINES IN THE DEIR. NONE, NOT FOR PASSENGER OR INDUSTRIAL, OR A DUMP RAILSPUR.  
- WHERE IS ANY STUDY OR ECONOMIC EVALUATIONS REGARDING CUTTING OFF THESE MENTIONED POSSIBILITIES?  
- (PAGE 7) "IN 2002 P.R. PARTNERED WITH SAC STATE " ... ?"  
- NOTHING HAS COME OF THIS OR LATER "PARTNERSHIPS"  
- REMOVE THIS BLATANT UNCONSUMATED "DEAL" FROM THIS SUPPOSEDLY FACTUAL REPRESENTATION FOR DEIR.

72-2

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

Thank you WMM W  
**WILLIAM WALTERS@YAHOO.COM**

**William Michael Wauters**

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cp

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I have reviewed the County's Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County:

**REAL ALTERNATIVES**

IT MUST BE VERY EMBARRASSING FOR SENIOR PLANNERS TO BE PRESENTING A "PLAN" WITH SO MANY PROBLEMS THAT THEY ADMIT ARE "SIGNIFICANT AND UNAVOIDABLE IMPACTS," FOR THE WHOLE AREA. THAT BIG MISTAKES WERE MADE BY DECADES OF PREVIOUS PLANNERS AND SUPERVISORS DOES NOT MEAN THAT GOOD MODERN PLANNING CAN NOT BE ADOPTED NOW, WITH A REVISED DEIR. PLEASE ADD THE AEL CITIZEN INITIATED SMART GROWTH PLAN BECAUSE IT IS A MUCH BETTER WAY TO MEET THE SAP GOALS.

72-3

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

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

*Thank you - W. Wauters*

**WILLIAM WALTERS@YAHOO.COM**

**William Michael Wauters**

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I have reviewed the County's Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County:

**UZ LAND DESIGNATION**

— THE DREAM OF A UNIVERSITY IS FLOATED IN THE DEIR. WHERE ARE ECONOMIC STUDIES CONFIRMING THIS WILL BE VIABLE? HOW ARE BRICK AND MORTAR SCHOOLS PROJECTED TO DO IN THE ADVANCED DIGITAL AGE? STUDIES?

72-4

— POWER POINT SLIDE #20; "PLACER PARKWAY" SHOWS A COUNTY OWNED PARCEL OF A MULTI-HUNDRED ACRE PARCEL LABELED; "REGIONAL UNIVERSITY"; BETWEEN REASON FARMS AND PLACER VINE YARDS. PLEASE ADD THIS TO YOUR DEIR REVISION WITH EVALUATION OF BOTH SITES, RATING DESIREABILITY OF BOTH.

72-5

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

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

*Thank you - WMW*

— **WILLIAM WALTERS@YAHOO.COM**

**William Michael Wauters**

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**Attn: Shirlee Herrington, Environmental Coordinator** 20 FEB. 2019

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I have reviewed the County's Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County:

**REGARDING "ECO-INDUSTRIAL"**

- WHERE ARE STUDIES AND MAPS OF THE FUTURE EXPANSION OF THE LANDFILL? PLEASE PROVIDE.
- THE WRSZ WILL FILL WAY BEFORE 80 YEARS? IF SO, WHAT WILL PLACER COUNTY DO TO SORT TRASH, RECYCLABLES AND COMPOST FOR ALL WESTERN RESIDENTS? PROVIDE ALTERNATIVES.
- IF NO ALTERNATIVES EXIST, WHAT ABOUT THE REALITY THAT WRSZ WILL BE A PERPETUAL SORTING AND COMPOSTING FACILITY? PRESENT COUNTY PLANS.
- PLACER COUNTY SOLID WASTE WILL HAVE TO BE TRUCKED FAR AWAY. WHAT ARE THE COUNTY WIDE POLLUTION PROBLEMS FROM THIS? WHAT ABOUT EXPANDING THE WRSZ TO MORE LAND? EVALUATE A RAIL TRANSPORT SPUR TO WRSZ.

72-6

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

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

Thank you, *WMM*  
**WILLIAM WALTERS@YAHOO.COM**

**William Michael Wauters**

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3091 County Center Drive #140  
Auburn, CA 95603**

**Attn: Shirlee Herrington, Environmental Coordinator**

**20 FEB. 2017**

**Dear Ms. Herrington and Chair and Members of the Placer County Planning Commission:**

I have reviewed the County's Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County:

**RAILSIDE INDUSTRIAL ZONING**

- IN PLACER COUNTY, INDUSTRIAL ZONING IS A LIMITED, HARD TO SITE REAL ESTATE VALUE. RAILSIDE PLOTS STILL ACCESSIBLE EVEN RARER.
- WHAT IS THE ECONOMIC VALUE OF THESE RARE RESOURCES NOW AND IN FUTURE?
- WHAT DOES OUR COUNTY LOSE IF WE CUT OFF THIS LIMITED ZONING TO THE RA?
- NOW IS THE TIME TO ADD A FUTURE WRSL INDUSTRIAL RAIL SPUR PATH TO THE SAP. PLEASE DO SO, WITH MAPS OF EXISTING R.R. SIDINGS.

72-7

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

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

*Thank you WmW*

**WILLIAM WALTERS@YAHOO.COM**

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<b>Letter</b> <b>72</b>	William Michael Wauters February 20, 2019
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- 72-1 The comment expresses concern about page limits and requests an extension of the comment period. See response to comment 32-1 regarding these topics.
- 72-2 The comment raises several individual issues, including that the Draft EIR does not identify a rail line, that nothing has come from partnerships with Sac State or other partnerships, and that the “deal” should be removed from the staff presentation. The comment suggests that the Draft EIR should be recirculated and that the CISGP should be analyzed. Regarding the rail line, the comment is correct that the Draft EIR does not identify a new rail line. Although the PCTPA has a planned capital corridor expansion, the plan does not identify a rail line in the SAP area. Also, such a line would not fall under the jurisdiction of the County and is not identified in any local or regional transportation plans. Regarding County partnerships, this does not constitute an environmental issue and is therefore not discussed further in this response. Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan.
- 72-3 The comment refers to the project’s significant and unavoidable impacts. See response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts. Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, 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. Also see Master Response 8: Recirculation.
- 72-4 The comment asks how brick and mortar schools are projected to do in the digital age. See response to comment 56-6.
- 72-5 The comment requests that Regional University be added to the evaluation of sites in the Draft EIR. Regional University is not owned by the County. Regional University is an approved specific plan with a certified environmental document that is separate and distinct from the PRSP.
- 72-6 The comment raises questions regarding the landfill expansion details and questions what alternatives exist for solid waste disposal if closure of the landfill occurs within the SAP’s 80-year buildout horizon. The comment also asks about the landfill’s potential role as a sorting and composting facility and also about the potential impacts related to hauling solid waste to a different facility. See response to comment 31-13 regarding the lack of availability of detailed landfill expansion plans. Regarding future closure of the landfill, the Draft EIR states (page 4.15-69) “based on WPWMA’s estimate of future disposal rates, WPWMA believes sufficient disposal capacity at the WRSL will be available until 2058.” An attempt to forecast a solid waste disposal scenario beyond 30 years, especially without knowing details of the WRSL expansion plans, would be speculative. The Draft EIR concludes that the impacts related to increase in demand for solid waste service, both on an individual project level (Impact 15-6) and a cumulative level (Cumulative Impact 4.15-17), are less than significant; therefore, there would be no foreseeable need to haul solid waste to a different location, and analysis of impacts related to hauling solid waste are not necessary.
- 72-7 The comment requests an additional railroad spur site in the SAP. Rail access is currently within the SAP. The proposed SAP does not limit rail access sites. The railroad line is controlled by UPRR, which is a separate entity that determines whether or not additional rail spurs will be located or expanded upon.

### 3.2.4 Late Comments

RECEIVED  
FEB 15 2019  
CDRA

Re: Sunset Area Plan/Placer Ranch Specific Plan DEIR Report – State Clearing House No.2016112012. Vol. 1 & 2

Letter  
73

Dear Shirlee Herrington,

Yet another disaster looms for Placer County because of totally incompetent planning. Whatever planning is done seems driven by greed, and greed is rather distant from common sense and fairness.

Whatever happened to the preservation of agriculture that the county espouses so vehemently in its Placer County Agricultural Plan? Obviously there is no value in so many feeble minds regarding agriculture, the very industry that feeds us. So, 8,000 more acres of open space is cast aside as progress when it is covered with roads, housing tracts, big box stores, and more. What is proposed is not progress.

Millions of dollars have been totally wasted in this projected plan. Meanwhile, Ascent Environmental has taken the taxpayers of Placer County to the bank, and no doubt they have laughed all the way. Their work is a sham, and taxpayers have been scammed.

Developments like this NEVER pay their way. Open space ag land costs very little in services demands in terms of infrastructure and everything else – law enforcement, fire services, schools, etc. – that are a part of development.

Effectively more transportation disasters will be a part of the idiocy this plan represents. Just look at the I-80 – Hwy. 65 debacle, and similar is in the cards.

The minions who have thrown this plan together have totally failed the taxpayer. This happens time and time again in Placer County because its esteemed planners are incompetent beyond belief. Your DEIR is incomplete and a disaster, not to mention a waste of colossal sums of taxpayer monies.

The public trust is gone. You too should be gone, along with every “expert” who has any effort at all in this project.

Greed needs to be displaced with a measure of sensitivity. Placer County does not need this disaster. Throw it out in its entirety and learn something from the realization that more, more, more is not a plan.

73-1

Letter 73 | Unknown  
February 25, 2019

73-1 The comment expresses opinion regarding the merits of the project. Environmental issues raised are general in nature. No specific issues are raised regarding the adequacy of the Draft EIR’s analysis and conclusions. No further response is warranted.

Letter  
74

**Mike Parker**

**From:** Leslie Warren <allianceforenviroleadership@gmail.com>  
**Sent:** Thursday, June 27, 2019 2:39 PM  
**To:** Mike Parker  
**Subject:** Phase 2 CISGP

Dear Mike,  
How are you today.

I'm wanting to greet you and introduce myself; as I am representing the Alliance for Environmental Leadership.

I also pleased to share Phase 2 of the Citizen Initiated Smart Growth Plan with you.

If you have questions on it, or on oPhase 1 of the CISGP, please do not hesitate to contact me at (530) 878-07308.

On another subject, I am looking at the SAP DEIR CO2 generation projections. W gas generating 20 lbs. per gallon burned and diesel, 23 pounds of CO2 per gallon, your projection of new tonnage of CO2 per year seems low considering the 800,000 new daily vehicular trips. How many miles per day did you estimate each vehicle would be driving and what was the car v diesel truck break out-and how many hours would the trucks be idling -not moving in the roadways? Do you still think your DEIR estimates are correct?

Thanks for getting back to me!

Leslie Warren

74-1  
74-2

Citizen Initiated Smart Growth Plan: Phase 2

Housing and Jobs. You may access the document here.

[bit.ly/CISGP\\_2](http://bit.ly/CISGP_2)

**Letter** | Leslie Warren  
**74** | June 27, 2019

- 74-1 The comment is an introductory remark by the commenter, as a representative of the Alliance for Environmental Leadership. The commenter has attached a document titled, "Phase 2 of the Citizen-Initiated Smart Growth Plan." Phase 2 of the CISGP relates primarily to affordable housing and does not relate to environmental issues.
- 74-2 The comment questions the estimate of mobile source-related GHG emissions from new daily vehicular trips. Specifically, the comment seeks clarification in the daily VMT, the fleet mix, and idling times assumed for quantification purposes. As discussed on page 4.7-12 of the Draft EIR, GHG emissions were modeled in the CalEEMod using the estimated levels of VMT provided in the traffic impact analysis conducted for the EIR. Daily VMT associated with project buildout was assumed to be 3,624,520 as shown in Table 4.14-32 of Section 4.14, "Transportation and Circulation," of the Draft EIR. CalEEMod generates emissions estimates from mobile sources based on the fleet mix for a specific geographical region provided by CARB's Emissions Factor 2014 model. A fleet mix is the composition of different vehicle types used based on a percentage of all vehicle types on the road. The fleet mix assumed in the CalEEMod modeling is provided in Appendix K for each CalEEMod output file under Table 4.4, "Fleet Mix." Regarding the assumptions about idling, particularly for large trucks, CalEEMod uses EMFAC 2014 emission factors for vehicle running exhaust, engine start exhaust, and idling exhaust. These emission factors are specific to the vehicle type, the year in which the modeling was conducted, as well as the geographical region.