

3 RESPONSES TO COMMENTS ON THE DRAFT EIR

This chapter contains comment letters received during the public review period for the Draft EIR, which concluded on February 19, 2019, including transcribed comments received during the February 14, 2019, public hearing. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIR.

Table 1-1 in Chapter 1, “Introduction,” presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

A public hearing to receive comments on the Draft EIR was held on February 14, 2019. The hearing was held during the regular meeting of the Placer County Planning Commission at 10:05 a.m. The hearing was recorded, and a transcript was prepared.

The verbal and written individual comments received on the Draft EIR and the responses to those comments are provided in Section 3.2, “Comments and Responses.” The comment letters and verbal comments made at the public hearing are reproduced in their entirety and are followed by the response(s). Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter.

3.1 MASTER RESPONSES

Several comments raised similar issues. Rather than responding individually, master responses have been developed to address the comments comprehensively. Master response topics are listed below, and the detailed master responses are provided in Sections 3.1.1 through 3.1.9. A reference to the master response is provided, where relevant, in responses to individual comments (see Section 3.2, “Comments and Responses.”)

- ▲ Master Response 1: Alternatives Analysis
- ▲ Master Response 2: Citizen-Initiated Smart Growth Alternative
- ▲ Master Response 3: Placer County Conservation Program and Mitigation
- ▲ Master Response 4: Odors
- ▲ Master Response 5: Greenhouse Gas Mitigation
- ▲ Master Response 6: Drainage and Flooding
- ▲ Master Response 7: Program- vs. Project-Level Analysis
- ▲ Master Response 8: Recirculation
- ▲ Master Response 9: Mitigation and Development Fees

3.1.1 Master Response 1: Alternatives Analysis

Numerous comments addressed the Draft EIR alternatives analysis, with several comments focusing on the Citizen-Initiated Smart Growth Plan (CISGP) Alternative and suggesting it should be studied further in the Draft EIR or approved instead of the proposed project. This master response focuses on the adequacy of the alternatives analysis, in general. For a discussion of the CISGP, see Master Response 2: Citizen-Initiated Smart Growth Plan.

ADEQUACY OF ALTERNATIVES ANALYSIS

CEQA and the State CEQA Guidelines identify the requirements for the analysis of project alternatives in the EIR. State CEQA Guidelines Section 15126.6 generally addresses the requirements for an alternatives analysis in an EIR:

- ▲ An EIR shall describe a reasonable range of potentially feasible alternatives to the project or the location of the project that would attain most of the basic project objectives and would avoid or substantially lessen any of the significant effects of the project.
- ▲ There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.
- ▲ The EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons for the lead agency's determination.
- ▲ The EIR shall include enough information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.
- ▲ The no project alternative should be evaluated along with its impacts. The purpose for describing the no project alternative is so decision makers can compare impacts of approving the proposed project with impacts of not approving the proposed project.
- ▲ The no project alternative for a project that revises an existing land use plan is the continuation of the existing plan.
- ▲ If it is found that the no project alternative is the environmentally superior alternative, then the EIR should identify an environmentally superior alternative among the other alternatives.

Screening of individual alternatives for consideration in an EIR involves evaluating each alternative for three elements under CEQA:

1. **Accomplishment of most of the basic project objectives:** Alternatives must accomplish most of the basic objectives of the project (State CEQA Guidelines Section 15126.6[c]). CEQA compels consideration of an alternative even if it "would impede to some degree the attainment of the project objectives" (Section 15126.6[b]).
2. **Potential feasibility:** An EIR must consider potentially feasible alternatives (Section 15126.6[a]). Section 15364 defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."
3. **Potential to avoid or substantially reduce a significant environmental effect of the proposed project:** An alternative must "avoid or substantially lessen any of the significant effects of the project" (Section 15126.6[a]).

An alternative that does not satisfy all three CEQA requirements would be dismissed from further evaluation in an EIR.

As described in detail below, the Draft EIR's evaluation of alternatives meets the CEQA requirements because it provides a reasonable range of feasible alternatives designed specifically to substantially reduce significant impacts associated with the proposed project, and it identifies the environmentally superior alternative.

ALTERNATIVES ANALYSIS

Draft EIR page 6-7 describes an off-site alternative that was considered but dismissed as infeasible because it does not meet certain critical location-related objectives. The Draft EIR carries four alternatives forward for full evaluation. Each alternative has a different land use configuration. The Draft EIR evaluates these

alternatives as to whether they also meet most of the project objectives and reduce or substantially avoid a significant impact of the proposed project:

- ▲ **Alternative 2: Reduced Scale.** This alternative includes reduced building heights to smooth the transition between developed and undeveloped areas compared to the proposed project. As explained in the Draft EIR at pages 6-15 through 6-16, Alternative 2 would reduce impacts on aesthetics and appears to meet most of the project objectives. This alternative would substantially reduce significant impacts related to the abrupt transition between development and undeveloped land; the Draft EIR has been revised on page 6-16 to clarify this conclusion.
- ▲ **Alternative 3: Reduced Footprint, Reduced Development Potential.** This alternative includes a reduced footprint and overall reduction in development potential compared to the proposed project. As explained in the Draft EIR at pages 6-16 through 6-21, Alternative 3 would reduce impacts on aesthetics; air quality; biological resources; greenhouse gases; population, employment, and housing; and transportation and circulation. The alternative appears to meet most of the project objectives. This alternative would substantially reduce significant impacts on vernal pool habitat; the Draft EIR has been clarified on page 6-19 to reflect this conclusion.
- ▲ **Alternative 4: Reduced Footprint, Smaller Development Potential.** This alternative includes similar overall development potential but on a reduced footprint compared to the proposed project. As explained in the Draft EIR at pages 6-21 through 6-24, Alternative 4 would reduce impacts on air quality and biological resources. The alternative appears to meet most of the project objectives. This alternative would substantially reduce significant impacts on vernal pool habitat; the Draft EIR has been clarified on page 6-24 to reflect this conclusion.
- ▲ **Alternative 5: Reduced VMT.** This alternative includes a suite of allowable land uses that would reduce vehicle miles traveled (VMT) compared to the proposed project. As explained in the Draft EIR at pages 6-25 through 6-27, Alternative 5 would reduce impacts on aesthetics; air quality; greenhouse gases; population, employment, and housing; and transportation and circulation. The alternative appears to meet most of the project objectives; as described later in this response, the Draft EIR has been clarified on page 6-25 to reflect this conclusion. This alternative would result in a substantial reduction in VMT; the Draft EIR has been clarified on page 6-27 to reflect this conclusion.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Draft EIR page 6-28 contains the evaluation of the environmentally superior alternative. The No-Project Alternative is environmentally superior; however, when the No-Project Alternative has been identified as the environmentally superior alternative, State CEQA Guidelines Section 15126.6(e)(2) requires that the environmentally superior alternative from among the remaining alternatives be identified. Therefore, the Draft EIR concludes that Alternative 3 is environmentally superior. Chapter 6 of the Draft EIR has been clarified to reflect the conclusions about each alternative substantially reducing a significant impact of the proposed project. These changes are identified below under “Revisions to the Draft EIR” as well as in Chapter 2, “Revisions to the Draft EIR.”

REASONABLE RANGE

The Draft EIR evaluated a reasonable range of alternatives. The Draft EIR evaluates four alternatives (and the No Project Alternative), which aim to reduce significant impacts of the proposed project while meeting most of the basic objectives of the project. CEQA does not specify how many alternatives constitute a “range of reasonable alternatives,” but provides the following guidance:

“The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.” (Guidelines Section 15126.6[f])

The discussion of alternatives is subject to a “rule of reason” (*Laurel Heights Improvement Assn. v. Regents of Univ. of Cal.* [1988] 47 Cal.3d 376, 406-407; *Citizens of Goleta Valley v. Board of Supervisors* [1990] 52 Cal.3d 553, 565-566). “There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.” (CEQA Guidelines Section 15126.6(a)). “The agency’s discretion to choose alternatives for study will be upheld as long as there is a reasonable basis for the choices it has made.” (1 Kostka & Zischke, Practice Under the Cal. Environmental Quality Act [Cont.Ed.Bar 2d ed. 2012] Project Alternatives Section 15:11, page 743 (rev. 3/12)) (*City of Maywood v. Los Angeles Unified School Dist.* [2012] 208 Cal.App.4th 362, 420-421). “The rule of reason ‘requires the EIR to set forth only those alternatives necessary to permit a reasoned choice’ and to ‘examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.’ (CEQA Guidelines Section 15126.6(f)) An EIR does not have to consider alternatives ‘whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.’ (CEQA Guidelines Section 15126.6(f)(3))” (*In re Bay-Delta Programmatic Environmental Impact Report* (2008) 43 Cal.4th 1143, 1163-1164).

The Draft EIR “permits a reasoned choice” by evaluating a range of alternatives each aimed at reducing significant impacts to key resources. Because the alternatives are designed to reduce specific environmental impacts, each alternative considered in the Draft EIR is substantially different from the others. Some include a slight modification to the project to avoid a specific impact, others seek to reduce a specific impact by drastically reducing development capacity in a major land use category, and others include complete redesign to reduce the development footprint and reduce multiple environmental impacts. The Draft EIR did not consider alternatives (other than the No Project Alternative) that could not feasibly attain most of the basic project objectives.

CONSIDERATION OF ALTERNATIVES BY PLACER COUNTY BOARD OF SUPERVISORS

When the Placer County Board of Supervisors considers whether to certify the EIR, the Board will also determine whether to approve the proposed project or an alternative that is feasible, avoids or substantially lessens any of the significant adverse effects of the project, and meets most of the basic project objectives. Feasibility of an alternative is considered twice in the CEQA process. As indicated previously, an EIR must consider the potential feasibility of alternatives, in addition to whether they meet most of the basic project objectives and avoid or substantially reduce a significant impact of the proposed project. The Board will also consider feasibility of alternatives when considering whether to approve the project. The Board can consider a variety of factors, such as economic, legal, social, and technological factors, when determining whether to reject alternatives in favor of the proposed project (see State CEQA Guidelines Section 15091[a][3]). If the Board finds an alternative considered potentially feasible in the EIR to be infeasible at the decision-making phase, that finding does not indicate the EIR should not have considered the alternative. For example, the Board can consider all comments received on the Draft EIR, as well as other material in the record when making its final determination about the proposed project. And the determination of feasibility inevitably requires exercise of judgment by the decision-making body regarding the factors to be considered when determining whether an alternative is feasible.

REVISIONS TO THE DRAFT EIR

For further clarity, the following revisions have been made to the Draft EIR alternatives analysis.

To provide clarification regarding Alternative 2 (Reduced Scale), the fourth paragraph on page 6-16 of the Draft EIR is revised as follows:

Aesthetics

The Reduced Scale Alternative would limit building height to 60 feet and would require softer transition between existing preserve/mitigation land and urban development by requiring single-story structures and additional buffers adjacent to the preserve/mitigation land, which would substantially reduce this significant impact. The alternative would otherwise include similar design guidelines to those included with the SAP and PRSP and that policies similar to those included in the SAP would apply. However,

even with lower-scale development, softer transition between existing preserve/mitigation land, and implementation of policies and design guidelines, the substantial change in visual character of the urban development contrasted against the undeveloped preserve/mitigation land would still constitute a substantial adverse change in visual quality. Therefore, although the impact under the alternative would be **less** than the project's impact as a result of the reduced building height allowance and the softer transitions, the impact would still be significant.

To provide clarification regarding Alternative 3 (Reduced Footprint, Reduced Development Potential), the last paragraph on page 6-19 and continuing to page 6-20 of the Draft EIR is revised as follows:

Biological Resources

Implementation of the project would result in significant impacts related to permanent loss of habitat for special-status-species and other sensitive habitat. Implementation of the Reduced Footprint, Reduced Development Potential Alternative would result in fewer acres of developed land, and would increase preservation of core vernal pool habitat from 29 percent under the project to 49 percent, which would be a substantial reduction of this significant impact. The U.S. Fish and Wildlife Service (USFWS) preservation target for vernal pool recovery core areas is 85 percent, so the increased preservation under the alternative would still fall short of the target, and the impact would remain significant. However, this alternative demonstrates a serious effort to minimize the impact to the extent feasible. Implementation of the alternative would also involve less construction than the project (because of the smaller development footprint) and would therefore result in slightly less likelihood that special-status species could be affected during construction. Mitigation measures needed for the alternative would be similar to those needed for the project. Overall, the impacts of the Reduced Footprint, Reduced Development Potential Alternative would be **less** compared to those resulting from the project.

To provide clarification regarding Alternative 4 (Reduced Footprint, Similar Development Potential), the third paragraph on page 6-24 of the Draft EIR is revised as follows:

Biological Resources

Implementation of the project would result in significant impacts related to permanent loss of habitat for special-status-species and other sensitive habitat. Implementation of the Reduced Footprint, Similar Development Potential Alternative would result in fewer acres of developed land and would increase preservation of core vernal pool habitat from 29 percent under the project to 49 percent, which would be a substantial reduction of this significant impact. The USFWS preservation target for vernal pool recovery core areas is 85 percent, so the increased preservation under the alternative would still fall short of the target, and the impact would remain significant. However, this alternative demonstrates a serious effort to minimize the impact to the extent feasible. Implementation of the alternative would also involve less construction than the project (because of the smaller development footprint) and would therefore result in slightly less likelihood that special-status species could be affected during construction. Mitigation measures needed for the alternative would be similar to those needed for the project. Overall, the impacts of the Reduced Footprint, Similar Development Potential Alternative would be **less** compared to those resulting from the project.

To provide clarification regarding Alternative 5 (Reduced VMT), the first paragraph on page 6-25 of the Draft EIR is revised as follows:

Section 4.14, "Transportation and Circulation," of this Draft EIR identifies significant project impacts related to VMT. Although project buildout would result in a lower VMT per capita than the existing VMT per capita generated by existing development in the project area, the project-generated VMT per capita levels would, even after implementing traffic demand management (TDM) strategies, continue to remain above the SACOG regional total VMT per capita. One of the reasons for the high level of VMT associated with the project is that the SAP EMU designation allows uses that could generate significant numbers of vehicle trips originating outside the region, such as entertainment venues and

super-regional destination retail (among other uses). Large numbers of trips from vehicle traveling long distances increases VMT per capita. This alternative is designed to reduce project VMT. It should be noted that, although this alternative was designed to address increased VMT, it would also likely result in reduced GHG emission, which is also a significant impact associated with project implementation. This alternative appears to meet most of the project objectives described above.

To provide clarification regarding Alternative 5 (Reduced VMT), the last paragraph on page 6-27 of the Draft EIR is revised as follows:

Transportation and Circulation

The project results in significant traffic impacts to a substantial number of roadway and transportation facilities across several jurisdictions. Implementation of the Reduced VMT Alternative would reduce the nonresidential development by 20 percent compared to the project. This reduction would translate into substantially less trip generation; however, considering that the alternative still results in the development of over 6,000 residential units and over 10 million sq. ft. of nonresidential development (not including the Sac State-Placer Center), the alternative would still result in substantial increase in traffic on the local roadway network compared to current conditions. It is likely that the alternative would result in impacts to fewer transportation facilities and that the impacts would be less severe; however, significant impacts would be likely even with implementation of similar mitigation measures. Also, because the Reduced VMT Alternative does not include non-residential development in the SAP's EMU, including regional- and super-regional-serving uses, the VMT would be reduced by 25 percent. Although this is a considerable reduction compared to project VMT, the VMT would still remain above the SACOG regional total VMT per capita. Overall, the No-Project Alternative would result in less impact than the project with respect to transportation and circulation, but there would still be significant impacts.

To provide clarification regarding the alternatives analysis, the third paragraph on page 6-28 of the Draft EIR is revised as follows:

State CEQA Guidelines Section 15126.6(e)(2) states that when the no-project alternative is identified as the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives. As discussed above and shown below in Table 6-7, all of the other alternatives result in an overall level of impact that is less than the proposed project, although none of the other alternatives completely avoid ~~or substantially reduce any of the~~ significant impacts of the project. Among these remaining alternatives, Alternative 3 is considered environmentally superior because it results in the greatest reduction of significant impacts, and it appears to meet most of the project objectives.

3.1.2 Master Response 2: Citizen-Initiated Smart Growth Plan

Master Response 1: Alternatives Analysis addresses the CEQA requirements for an analysis of project alternatives and explains how the Draft EIR meets those requirements. In sum, the Draft EIR meets the CEQA requirements because it provides a reasonable range of feasible alternatives designed specifically to substantially reduce significant impacts associated with the proposed project, and it identifies the environmentally superior alternative. See Master Response 1: Alternatives Analysis for more detail.

However, one of the primary purposes of CEQA is to allow the public to provide input on the environmental analysis, including, importantly, suggestions for other avenues or more effective methods to reduce significant impacts through mitigation measures and alternatives. Specifically, California Code of Regulations (CCR) Section 15204 states that comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. CEQA, in fact, classifies a new feasible alternative or mitigation measure as "significant new information" that would require recirculation of the Draft EIR if the new (feasible)

alternative or mitigation measure is considerably different from the others previously analyzed in the Draft EIR, it would clearly lessen the project's environmental impacts, and the project proponent declines to adopt it. Therefore, a new alternative or mitigation measure suggested during the public review period requires thorough review and thoughtful consideration to determine whether the alternative is feasible and whether the Draft EIR should be recirculated to include it.

CITIZEN-INITIATED SMART GROWTH PLAN

During the public review period a suggested alternative to the project was submitted by the Alliance for Environmental Leadership (AEL). The alternative, called the Citizen-Initiated Smart Growth Plan (CISGP), is a comprehensive, thoughtfully prepared plan, which attempts to achieve, among other objectives, reduction of significant environmental impacts associated with the proposed project. As stated in the CISGP, the plan's purpose is to put forward a climate-resilient, low-carbon alternative to urban sprawl for the SAP update to the General Plan. The CISGP's objectives include providing diverse opportunities for industrial innovation, providing mixed-use compact development, providing housing choice, providing high-quality design and amenities, enhancing existing assets, maintaining natural resource value, retaining unique land supply, providing protection from incompatible land uses, providing education and outreach, and monitoring. The CISGP uses the existing Sunset Industrial Area (SIA) Plan boundary, so the CISGP area is more than 300 acres smaller than the proposed project area. Also, importantly, the CISGP does not include a specific plan alternative to the PRSP, although it does apply land use designations in the PRSP area.

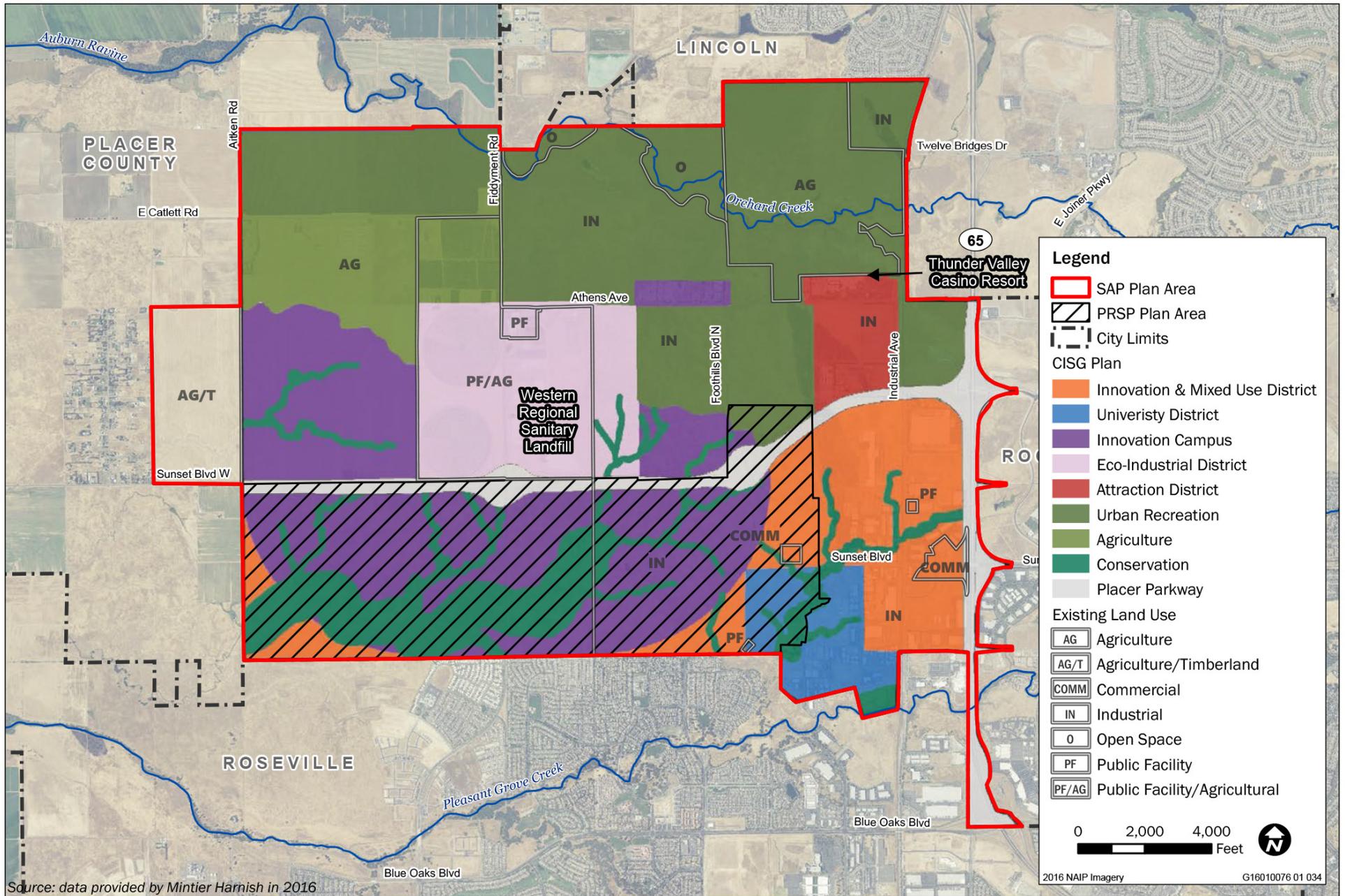
The CISGP appears to employ three primary strategies for reducing environmental impacts, which can be summarized as follows:

- ▲ decreasing the overall area identified for urban development to provide greater avoidance of on-site natural resources, including biological, cultural, and agricultural resources;
- ▲ maintaining the existing landfill buffer by excluding all residential and other sensitive land uses within 1 mile of the landfill; and
- ▲ increasing the level of urban development and adjusting the jobs/housing mix to increase per-capita energy and transportation efficiency, thereby attempting to reduce project-related significant impacts associated with air pollutant and greenhouse gas (GHG) emissions, as well as impacts related to VMT.

The effectiveness of these impact-reduction strategies is discussed further below.

The CISGP includes eight different land use categories, which the CISGP calls "zoning types": an Innovation & Mixed Use District, a University District, an Innovation Campus District, an Eco-Industrial District, an Attraction District, an Urban Recreation District, an Agriculture District, and a Conservation District. The Innovation & Mixed Use District includes four subtypes: Town Centers, High Density Industrial Mixed Use, Office and R&D, and Office Industrial. See Exhibit 3-1, which shows the CISGP zoning types and subtypes overlaid onto an aerial photo. A side-by-side comparison of the CISGP zoning types with the SAP/PRSP land use designations would reveal differences in how each of the land use categories allows various land use types.

However, taken as a whole, across the entire plan area, the CISGP allows land uses similar to those allowed in the SAP/PRSP (e.g., residential, commercial, office, university, entertainment, mixed-use, industrial, research and development, open space), although they may be distributed between the various zoning types and land use designations differently. Therefore, additional discussion related to the differences between the individual land use designations versus zoning types is not needed. The Agriculture District is an exception and is discussed further below. The key differences between the CISGP and the SAP/PRSP relate largely to the area and intensity of development, plan wide.



Source: data provided by Mintier Harnish in 2016

Exhibit 3-1

As reported in the CISGP (pages 50–51), implementation of the plan would add over 84,000 residents occupying over 46,000 new units within the existing SIA boundary. For context, the population of the city of Rocklin was estimated to be 67,000 in 2018 [U.S. Census Bureau 2018]. The CISGP would add over 32 million square feet (sq. ft.) of office and retail development and over 36 million sq. ft. of industrial development. The CISGP states (page 48) that the total development area is 3,868 acres. The CISGP includes 2,564 acres of conservation land, 849 acres of urban recreation, and 484 acres of agriculture and urban reserve.

COMPARISON OF CISGP TO SAP/PRSP

The CISGP includes a detailed comparison of the plan’s development capacity with that of the SAP/PRSP. Tables 3-1 and 3-2 provide comparisons of the CISGP and SAP/PRSP. Table 3-1 compares numbers related to overall population, jobs, housing, and jobs-to-housing ratio. Table 3-2 compares development capacity of various land use types (note that some assumptions were made, due to differences in the way these land use types were presented). Both Table 3-1 and Table 3-2 show the SAP/PRSP numbers as they were presented in the CISGP, as well as the numbers presented in the Draft EIR (primarily from Section 4.12, “Population, Employment, and Housing,” and Table 6-1 in Chapter 6, “Alternatives”), because the CISGP’s numbers for the SAP/PRSP project did not match the numbers in the Draft EIR.

Table 3-1 SAP/PRSP and CISGP Population, Employment, and Housing Comparison

	SAP/PRSP (Numbers from Draft EIR)	SAP/PRSP (Numbers from CISGP)	CISGP	Difference (CISGP minus SAP/PRSP)
Population Added	19,314	17,367	84,080	64,766
Jobs Added	55,760	192,879	151,463	95,703
Housing Units	8,094	8,950	49,614	41,520
Jobs-to-Housing Ratio	6.88	21.55	3.05	-3.83

Sources: Placer County 2018; AEL 2019

Table 3-2 SAP/PRSP and CISGP Development Capacity Comparison

	SAP/PRSP (Numbers from Draft EIR)	SAP/PRSP (Numbers from CISGP)	CISGP	Difference (CISGP minus SAP/PRSP)
Residential				
Single-Family Residential	3,082 du	5,726 du ¹	1,428 du ¹	-1,654 du
Age-Restricted Residential	1,050 du	-	-	-1,050 du
Multi-family Residential	3,962 du	3,224 du	48,186 du	44,224 du
Commercial/Industrial				
Retail Floor Area ²	4.92 million sq. ft.	30.46 million sq. ft.	22.5 million sq. ft.	15.72 million sq. ft.
Office Floor Area	2.35 million sq. ft.	26.05 million sq. ft.	9.29 million sq. ft.	6.94 million sq. ft.
Industrial/R&D Floor Area	26.00 million sq. ft.	20.16 million sq. ft.	36.76 million sq. ft. ³	10.76 million sq. ft.
Public				
University	30,000 students; 3 million sq. ft.	3.24 million sq. ft. ⁴	2.48 million sq. ft. ⁴	-0.52 million sq. ft.
Public Facilities	16.6 acres	-	-	N/A
Recreation/Open Space				
Parks/Open Space	334.6 acres ⁵	335 acres	849 acres	514.4 acres
Preserve/Mitigation Area	2,528.6 acres	2,278 acres	2,564 acres	35.4 acres

Table 3-2 SAP/PRSP and CISGP Development Capacity Comparison

	SAP/PRSP (Numbers from Draft EIR)	SAP/PRSP (Numbers from CISGP)	CISGP	Difference (CISGP minus SAP/PRSP)
Agriculture				
Agriculture	-	-	484 acres	484 acres

Notes: du = dwelling units; sq. ft. = square feet.

¹ Includes large-lot detached, small-lot detached, and attached (townhome-style) single-family units identified on CISGP page 50.

² Includes entertainment/mixed-use.

³ Assumed to include R&D uses.

⁴ It is assumed that “Education Building Area” in the CISGP refers to university uses (page 51).

⁵ From Draft EIR Table 4.13-10.

Sources: Placer County 2018; AEL 2019

As shown in Tables 3-1 and 3-2, the amount of development and resulting population and employment are substantially higher under the CISGP than under the SAP/PRSP. The CISGP would result in over four times more direct population growth than 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 CISGP includes more than double the amount of parks and open space, but the preserve/mitigation area is roughly the same. The CISGP includes 484 acres of land dedicated to agricultural uses, which is not a land use category included in the SAP/PRSP. It is unclear how the CISGP accommodates public services. There is a line item on page 51 for “Education Building Area,” which is assumed to accommodate the university as there are no other education uses identified under the other categories; however, it is possible that it encapsulates K-12 facilities. The CISGP does not appear to quantify other public services such as law enforcement facilities or fire stations, nor is it clear that the plan includes these facilities at all as they are not identified in the Zoning Place Types Table on page 43 of the CISGP.

The CISGP is a much more aggressive plan than the SAP/PRSP in terms of the amount and intensity of urban development; it places a substantially greater amount of development in a smaller development area. Although information is not provided in the plan that would allow a direct “apples-to-apples” comparison of the residential density and commercial intensity of the two plans, based on the overall level of development identified and the area of development, the urban scale in many portions of the CISGP, upon plan buildout, would appear similar to a downtown setting in a midsized city, such as Sacramento, dominated by low- and midrise buildings, with some high-rise structures. By contrast, while the SAP/PRSP identifies higher residential density and commercial intensity than other existing developments in the vicinity and would allow multistory structures (including some high-rise buildings in the Entertainment Mixed-Use [EMU]), the overall urban scale would be much lower than under the CISGP and would contrast less with scale of surrounding development. The CISGP is designed based on the premise that its proposed level of urban intensity would increase energy efficiency, increase transit opportunity, create a better internal jobs-housing balance, and have better consistency with Sacramento Area Council of Government’s (SACOG’s) Sacramento Region Blueprint (Blueprint).

SACOG BLUEPRINT AND MTP/SCS CONSISTENCY

The CISGP suggests that it is more consistent with SACOG’s Blueprint than the proposed project. The Blueprint is a visionary plan that promotes several smart-growth principles to encourage a variety of housing options in proximity to employment, shopping, and entertainment hubs. Adopted by the SACOG Board of Directors in 2004, the Blueprint includes a growth scenario (map) for 2050 that provides a concept-level illustration of how the region could grow using the growth principles, but it is not intended to be applied or implemented in a parcel-specific manner. The Blueprint Special Report identifies several smart-growth objectives, including housing choice and diversity, use of existing assets, compact development, and natural resource conservation. The CISGP focuses on many of these Blueprint objectives, especially the objective related to compact development. However, it seems to focus less on the Blueprint’s goal of housing choice

and diversity. The Blueprint Special Report (page 4) states that providing a variety of places where people can live—apartments, condominiums, townhouses, and single-family homes on varying lot sizes—creates opportunities for the variety of people who need them: families, singles, seniors, and people with special needs (SACOG 2007). The CISGP offers primarily apartments and condominiums with some attached townhomes allowed, but no detached single-family homes.

As noted in Section 1 of the PRSP, the objective for Blueprint consistency is to create a development plan that provides higher-density residential neighborhoods, compact forms of development, alternative transportation options, and an interconnected network of residential neighborhoods, commercial nodes, and employment centers. The PRSP's development plan incorporates measures to achieve its stated Blueprint objective and to implement SACOG's adopted Blueprint growth principles. For example, a 200-acre mixed use Town Center is planned, which is located adjacent to a planned university and 335-acre employment center. This district allows for over 1,300 high-density residential units at a density of approximately 26 units per acre, over 500 single-family homes with a compact development form, and over 600,000 sq. ft. of commercial/office uses. In total, approximately 33 percent of the PRSP's planned residential units are provided in the Town Center district and are located in walkable distance to nearby commercial and employment uses. Additionally, the students and employees from the university, as well as employees from the Campus Park employment center, are in walking distance to the Town Center's commercial centers. By concentrating the PRSP's highest-density and intensity uses into a single area, which is adjacent to the university and employment center, the development plan implements several Blueprint principles related to mixed-use development, compact development, housing choices, and transportation choices.

In addition to the smart-growth principles designed into the Town Center, the PRSP also supports alternative transportation modes and natural resource conservation. The PRSP includes a route for bus rapid transit along major roadway corridors serving the Campus Park employment center, the university, and the Town Center. The project also includes a network of Class I bike paths that link the employment center, university, and Town Center with the residential neighborhoods, schools, and parks. These two elements of the development plan further support the Blueprint principle related to transportation choices. The PRSP also sets aside nearly 240 acres of permanent open space, not including open space areas within the university site or other planned parks and paseos within the university. The PRSP's open space network preserves habitat associated with on-site creeks, drainage ways, wetland features, and grassland, which supports the Blueprint principle related to natural resource conservation.

Finally, a comprehensive set of community Design Guidelines are included as part of the PRSP development plan, which require that future development projects collectively create a quality community. These Design Guidelines support the Blueprint principle to create quality design in newly developing communities. In summary, these design features and elements of the PRSP enable the project to be consistent with SACOG's vision for the Blueprint.

It is also important to note that SACOG's 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) identifies the SAP area as a "Developing Community," which it defines (page 27) as typically situated on vacant land at the edge of existing urban or suburban development. Developing Communities are the next increment of urban expansion. They are identified in local plans as special plan areas, specific plans, or master plans and may be residential-only, employment-only, or a mix of residential and employment uses. Transportation options in Developing Communities often depend, to a great extent, on the timing of development. Bus service, for example, may be infrequent or unavailable today, but may be available every 30 minutes or less once a community builds out. Walking and bicycling environments vary widely though many Developing Communities are designed with dedicated pedestrian and bicycle trails. This description is not consistent with the CISGP, which includes medium- and high-density residential development and intense commercial development.

The CISGP more closely resembles the Center and Corridor Community, which the MTP/SCS (page 26) defines as having land uses that are typically higher density and more mixed than surrounding land uses. Centers and Corridors are identified in local plans as historic downtowns, main streets, suburban or urban commercial corridors, rail station areas, central business districts, or town centers. They typically have more

compact development patterns, a greater mix of uses, and a wider variety of transportation infrastructure compared to the communities surrounding them (SACOG 2016).

JOBS-HOUSING BALANCE

The CISGP seeks to create an internally focused jobs-to-housing balance and also aims to increase energy efficiency and promote transit opportunities by increasing density and intensity of urban development. Regarding the jobs-to-housing balance, an internally balanced jobs-to-housing ratio does not provide benefit if it does not consider the context of the regional jobs-to-housing ratio. While the CISGP would result in an internal jobs/housing balance, the CISGP does not help the jobs/housing balance in the project vicinity, which is more housing heavy. As explained in the Draft EIR (page 4.12-5), the market analysis prepared for the SAP noted that prevailing literature shows that a jobs to housing ratio of 1.5 is ideal (Economic & Planning Systems, Inc. [EPS] 2015:42). In 2012, the South Placer area had approximately 1.31 jobs for every housing unit, indicating that South Placer should add more employment opportunities to strike a better balance (EPS 2015:42). More specifically, the Draft EIR (page 4.12-13) states while the Cities of Rocklin and Roseville have ratios of 1.24 and 1.22, respectively, the overall ratio for the whole of Placer County is 1.08. Looking strictly at the numbers for project buildout, the project would add substantially more jobs than housing units, making it a “jobs-rich” area. However, viewed in the context of all of Placer County, the project’s contribution would serve to provide more balance to Placer County. As stated in the Draft EIR (page 4.12-11), if the proposed project were 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. Conversely, by maintaining an internally balanced jobs-to-housing ratio, the CISGP does not help balance the existing jobs-to-housing ratio in the region.

Regarding energy efficiency and transit opportunity, the CISGP states (page 47) that the plan strives to decrease GHG emissions per capita rather than displace the effect. This suggests that the CISGP is designed to absorb regional development capacity such that it would diminish development elsewhere, thus replacing less efficient (the CISGP assumes) development planned in the vicinity with the CISGP’s more efficiently designed development. This replacement of currently planned development is critical for the CISGP to succeed in offsetting its substantial (albeit relatively more efficient) vehicle trip generation, energy consumption, and GHG emission. (For more details regarding the CISGP’s trip generation, energy consumption, and GHG emission, see the “GHG and Air Quality Impacts” discussion below under the heading “Effectiveness of Impact Reduction.”) Otherwise the substantial level of development (and all of the associated traffic, energy consumption, and GHG emissions) included in the CISGP would be additive to the development currently planned in the vicinity, including in the cities of Lincoln, Rocklin, and Roseville. However, the CISGP does not include a mechanism to ensure that development would occur within the CISGP and not within other areas in the vicinity that are planned for development; rather, the plan seems to trust that the future real estate market would demand high-density, metropolitan-style development. The CISGP does not include any market studies or other evidence that would explain how the real estate market would support a new metropolitan center surrounded mostly by existing suburban communities. The EPS market study prepared for the SAP/PRSP suggested that the SAP would not achieve full buildout until 80 years or beyond. Without a market study, it is unclear, and the CISGP does not provide any evidence to support, how the CISGP—a development within roughly the same plan area with several times more development capacity than the SAP/PRSP—would have enough market demand to ever achieve full buildout. It is also unclear how a plan with so much high-density residential development could be viable in a location where the local market appears to have historically favored subdivisions with mostly detached single-family units.

FEASIBILITY OF CISGP

Market Feasibility

To better understand the market feasibility of the CISGP, the County asked EPS to review the CISGP and provide its professional evaluation. The following discussion is based on the EPS memo dated, July 18, 2019.

The CISGP envisions development of about 49,600 residential dwelling units, of which 97 percent are identified to comprise multifamily development, with the remaining percentage comprising single-family attached townhomes (which is a multifamily product but distinguished in the CISGP from other multifamily units). Per the plan, dwelling units are shown to have average densities ranging from 24 units per acre to 77 units per acre, although the CISGP does not provide relative percentage of total units by housing typology or density category.

There is no evidence to suggest the quantity of high-density residential development proposed under the CISGP is supportable in the South Placer market location, both currently and over the next several decades. The amount and similarity of the high-density residential development proposed in the CISGP would have a protracted absorption schedule, based on existing and projected market conditions that indicate limited demand for multifamily development, described in detail below. Further, reserving land for high-density residential that is not supportable in the foreseeable future can have detrimental impacts on the local economy, tying up land that will not be used and imprudently using resources to fund and construct infrastructure in support of vacant parcels.

There is current and long-term support for multifamily high-density development in the project area and throughout Placer County. The quantity, rate of absorption, location, and density of development will be dictated by the parameters of localized supply and demand variables, as described below. Higher-density development will likely occur close to existing and emerging employment centers in the county and other areas where demand and land values are highest, including the proposed employment and entertainment centers envisioned in the SAP/PRSP. That said, landowners, upon weighing supply and demand variables and evaluating financial feasibility, will develop residential products at densities consistent with current and proposed average residential densities until land values, other cost and revenue variables, and consumer preferences support higher densities.

Housing markets reflect a myriad of conditions related to both demand and supply. 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; a long-term economic outlook; and other factors. Housing supply is similarly affected by a number of different factors, including housing cost, land value, landowner expectations and preferences, government regulations, availability of financing, and other factors.

Residential density reflects a balance between supply and demand for land in a specific location. High demand for a specific location causes higher land prices and the efficient consumption of land (higher-density development) while low demand causes the converse. Density is an *indicator* of market constraints, primarily driven by household and business income, land supply, and transportation efficiencies and cost (EPS 2019).

Empirical data from a large sampling of cities worldwide, with differing cultures, histories, economies, climate, topographies, and employment center development (i.e., centralized versus dispersed), show a predictable spatial pattern correlating land values and residential density. That is, land prices and densities are highest in the central business district (or geographical center) and decline commensurate with distance from the center (EPS 2019). This pattern is observed nearly universally because land and housing prices and densities abide by the supply and demand model. Locations far from geographical centers and areas of high consumer demand have not been found to support high-density development.

From an individual landowner perspective, landowners are incentivized to construct the highest and best use on their land. “Highest and best use” is a widely used economics term to describe the use that is reasonably probable, physically possible, supported by the market, and returns the highest value to the land (Schwenker 2019). Landowners prepare pro forma analyses, evaluating the cost of land and vertical construction, sale or leasing revenues, and profit margins to determine the type and quantity of appropriate development types. Landowners must balance these inputs with market demand, supply variables, and preferences for risk and timing, to determine their willingness to construct different types of development.

The prevailing highest and best use for residential-zoned land in Placer County is single-family detached housing. Approximately 80 percent of housing units countywide *and* in the South Placer market are single-family detached, while remaining units comprise multifamily and other housing units (e.g., mobile homes) (U.S. Census Bureau 2013-2017). For context, relative to the amount of high-density housing proposed in the CISGP (nearly 50,000 multifamily units), the county currently contains approximately 13,000 multifamily units (EPS 2019). In addition, the current inventory of multifamily housing in the county has an average density of about 20 units per acre (CoStar 2019).

Recent historical absorption of residential development in the county has a consistent allocation of housing typology as the overall housing inventory. Between 2009 and 2017, the county added just under 2,000 units annually, primarily concentrated in south Placer County. Of these units, about 1,500 units (about 75 percent) were single-family, while about 450 units (almost 25 percent) were multifamily (U.S. Census Bureau, 2005-2009 and 2013-2017).

Based on multiple population and housing projection data sources, the county (inclusive of all incorporated cities and the unincorporated county) is anticipated to add 10,400–23,900 new units between 2018 and 2040 (about 500–1,100 units, annually). The South Placer market is anticipated to accommodate most of this growth, adding 7,300–16,700 new units between 2018 and 2040 (about 330–800 new units, annually). Of new residential units planned in the South Placer market, there is overwhelming support for new single-family detached development over other residential types. Market demand preferences support nearly 90 percent single-family detached housing development, with the remainder comprising multifamily development (EPS 2019). Applying the projected annual units estimated to be supported by market demand, the CISGP could take upwards of 150 years to absorb (if all units projected to absorb in the South Placer market occurred in the Sunset Area, which is unlikely given other planned development and the homogeneity of residential uses proposed under the CISGP).

There are numerous specific plans being planned in the South Placer market in addition to the SAP. The land use programs for each project are developed through a detailed process of weighing supply and demand variables with an assessment of the landowners' highest and best uses. In aggregate, residential land uses for proposed specific plans comprise approximately 80 percent single-family detached housing and 20 percent higher density multifamily housing. The average density of proposed multifamily housing units is about 21 units per acre. (The breakdown of housing units by tenure is derived from Bay Area Economics 2018, cited in EPS 2019. Projects included those in the South Placer market area only: Placer Ranch, Bickford Ranch, Riolo Vineyards, Regional University, Amoruso, and Lincoln Village 5.)

In summary, there will be demand for multifamily housing in Placer County and, specifically, in the project area. However, existing and projected economic conditions do not support the amount and densities of proposed residential development in the CISGP in the short term or over the next several decades.

CISGP University Feasibility

In addition to issues with real-estate-market-related feasibility, implementation of the CISGP presents other feasibility issues. One of the most prominent relates to the proposed Sac State–Placer Center, which is a key piece and a core objective of the PRSP. There are two primary feasibility issues related to the University District included in the CISGP. The first is that most of the University District is located outside the existing PRSP boundary. Under the PRSP, the land for the Sac State–Placer Center site would be donated by the PRSP landowner. If the site was moved outside the PRSP, the land would not be available for donation, and the County, the California State University (CSU) system, or another entity would need to purchase the land. However, the land designated University District in the CISGP is already owned by a variety of other landowners. Therefore, the CSU or County would need to find willing sellers and/or condemn the private property via eminent domain (which requires fair-market-value payment to the property owners). Either of these options would require substantial additional public funds and would render the University District portion of the CISGP financially infeasible. In addition, even if funds were available, the County would not consider undertaking an eminent domain action on a significant amount of land in this area if property owners were not willing to sell; this would also render the University District infeasible as shown in the CISGP.

The second feasibility issue related to the CISGP's University District location is that it encompasses a substantial area of land that is already developed. See Exhibit 3-2. In order to develop these properties with university uses, the existing structures and infrastructure would need to be either demolished or repurposed. The CISGP promotes adaptive reuse of these structures and infrastructure as a positive aspect of the plan, indicating that adaptive reuse will help the university develop with less infrastructure and utility expansion cost. When feasible, adaptive reuse of structures is usually environmentally superior to demolition and new construction. Adaptive reuse is often a viable strategy when one, or possibly a few structures are involved and is most commonly used to avoid demolishing historic or otherwise important/valuable structures. However, the large, primarily single-story existing warehouse-style buildings that dominate the CISGP's University District are not historically significant and are incongruous with the types of structures necessary for a modern university campus. Also, the current layout of the existing structures, which are separated from each other by roadways, vacant land, and parking lots, would present major constraints for designing a cohesive university campus that is internally and externally well-integrated and that would allow convenient pedestrian access between buildings. Finally, the infrastructure (i.e., roads, power/gas lines, and water/wastewater lines) currently supporting the existing industrial uses would not be sufficiently sized to support an entire university use, as suggested by the CISGP.

As previously mentioned, the proposed Sac State–Placer Center is a central piece of the PRSP portion of the SAP. One of the primary objectives of the PRSP (Draft EIR page 3-7) is “to establish a site for California State University, Sacramento–Placer Campus: Provide 300 +/- acres to CSU for development of a Sacramento State (Sac State) off-campus center in Placer County, which is sized to potentially accommodate up to 30,000 students (25,000 Sac State and 5,000 Sierra College).” Failure to include a feasible university site means failure to meet a core project objective. The proposed university site is also key to meeting other stated project objectives, including those related to providing a balanced land use mix, catalyzing development of the Sunset Area, establishing a major employment, and incorporating a Town Center (adjacent to a university). Because the CISGP's University District is considered infeasible, the CISGP would not meet these critical project objectives.

One-Mile Landfill Buffer Feasibility

It is important to note that the primary reason offered by the CISGP for siting the University District in the selected location was to move it outside the existing 1-mile landfill buffer. This attempts to reduce the project's significant impacts related to odor and land use compatibility. The County understands the difficulty in identifying land outside the 1-mile buffer that could feasibly support development of sensitive land uses, including a university. During the alternatives development process, County staff and consultants examined undeveloped areas outside the 1-mile buffer that would be appropriate for sensitive land uses. Exhibit 3-3 shows the land outside the 1-mile buffer. Unfortunately, due to the size and central location of the Western Placer Waste Management Authority (WPWMA) property in the SAP area, land outside the 1-mile buffer is limited to the corners and edges of the SAP area. Much of the land in these areas is already developed with existing industrial uses. Developed areas were not considered feasible for the reasons described above. Existing natural features such as creeks, as well as large existing preserve areas, further restrict the availability of developable land outside the 1-mile buffer. Large, contiguous areas of vacant land, which would be necessary to allow development of well-planned and well-integrated housing to support the proposed commercial uses and meet project objectives related to provision of housing, were not available in these areas. Vacant land in these areas would restrict residential development to a patchwork of small subdivisions surrounded and disrupted by existing industrial uses. It is important to note that, although the CISGP suggests an adaptive reuse approach for existing structures in the University District (which, as discussed above, would be infeasible), it does not provide an approach for addressing the same issue for the large number of existing industrial structures in other CISGP zoning types, most notably the types that allow residential uses, including the Town Center, Office and R&D, and high-density industrial mixed-use subtypes. It is unclear how the large, single-story existing structures, which have been historically used for industrial uses, would be appropriate for re-use as residential structures. It is also unclear how the zoning types that permit residential uses would function cohesively given the pattern of existing structures (discussed above).

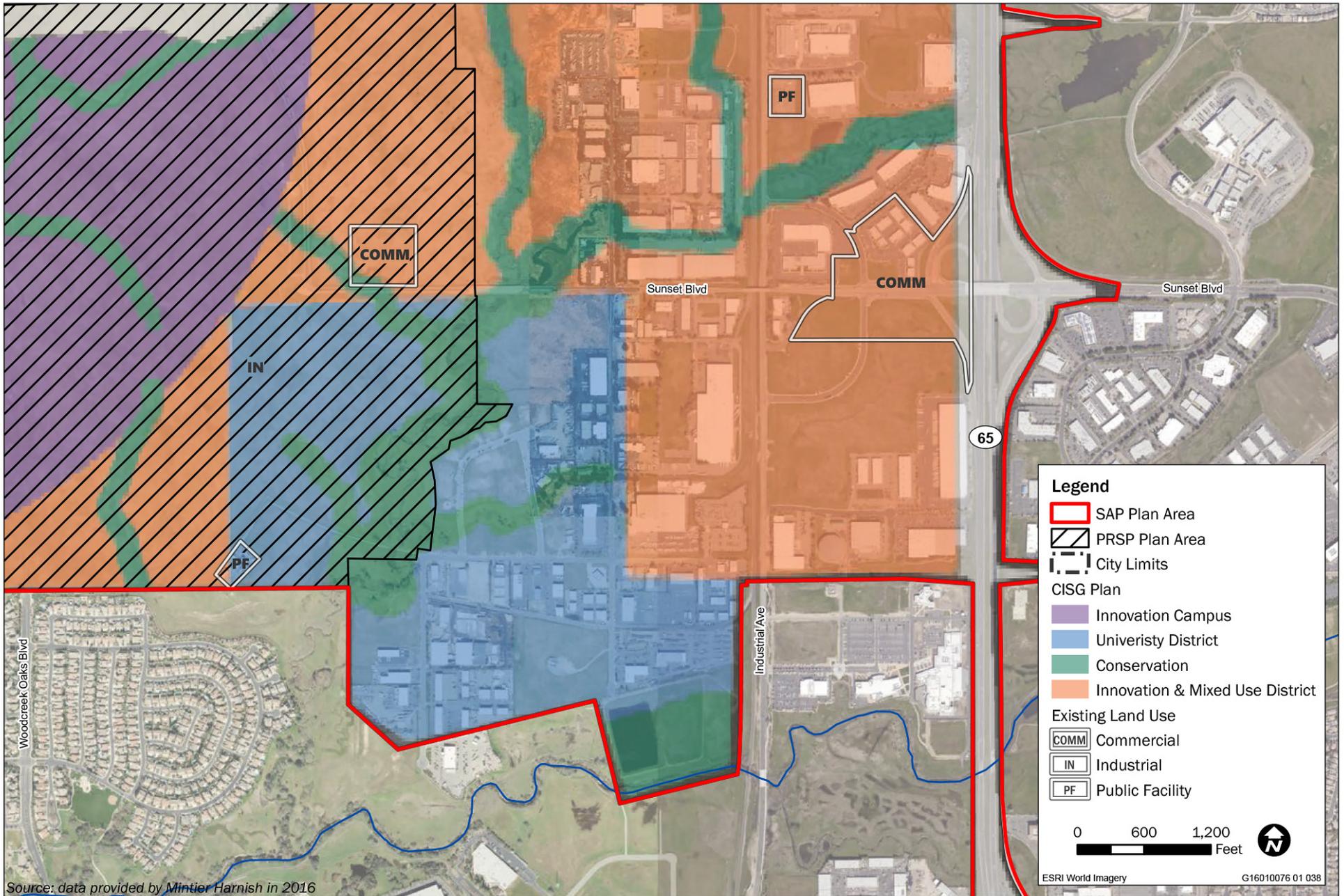


Exhibit 3-2

Existing Structures within CISGP University District



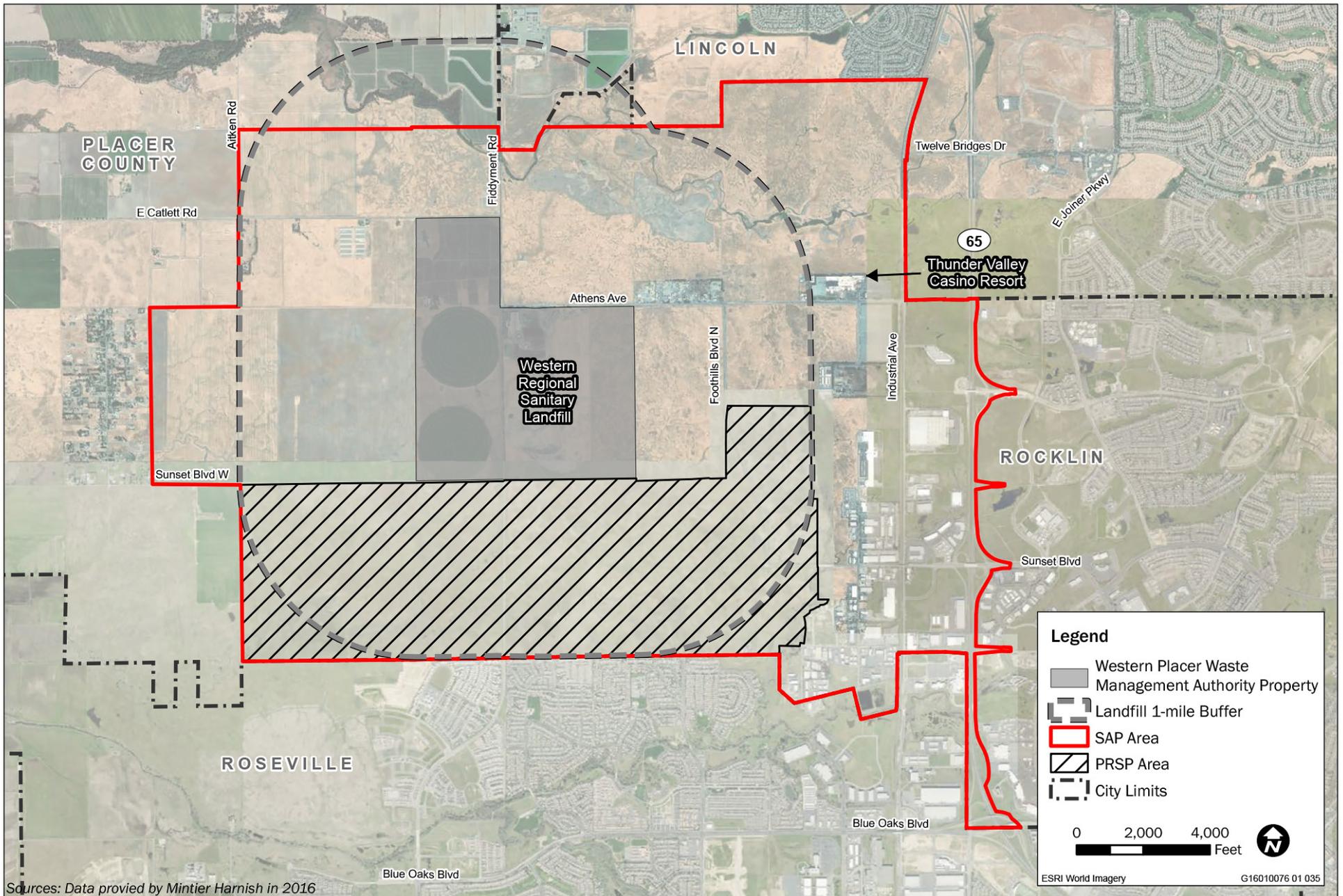


Exhibit 3-3

One-Mile Landfill Buffer



For these reasons, County staff found that an alternative to the project that meets most of the project objectives, while prohibiting sensitive uses within 1 mile of the WPWMA landfill property, was infeasible. The only alternative identified in the Draft EIR that maintains the 1-mile buffer is the No Project—1997 SIA Plan Alternative. The 1997 SIA Plan is consistent with the 1-mile buffer policy because the primary type of development allowed is industrial and other non-residential development types. However, as stated in the Draft EIR (page 6-28) implementation of the No-Project–1997 SIA Plan Alternative would not meet most of the primary project objectives for SAP and would not meet any of the primary objectives for the PRSP.

EFFECTIVENESS OF IMPACT REDUCTION

The following discussion identifies the primary project-related environmental impacts that the CISGP was designed to reduce and examines each with respect to the actual level of impact reduction that would likely be achieved by the CISGP.

Reduction of Farmland Impacts

The Draft EIR concludes that the SAP/PRSP would result in a significant impact regarding conversion of Farmland to nonagricultural use. Similar to the SAP/PRSP, the CISGP would also convert Farmland to nonagricultural use and would therefore, like the project, result in a significant and unavoidable impact. However, the CISGP includes an “Agriculture” district that would conserve some of the existing Farmland. Therefore, its impact would be less than the project, but would not avoid a significant impact.

Reduction of Odor Impacts

The CISGP is designed to reduce odor impacts by moving the University and other sensitive land uses outside the existing 1-mile buffer; however, as discussed above, the strategy is, ultimately, infeasible. It is also important to note that the 1-mile buffer was not established based on any empirical data related to distance from an odor source; therefore, the existing buffer should not be viewed as a boundary between areas exposed to odor from the landfill and areas not exposed. Odor complaints have been recorded well outside the 1-mile existing landfill buffer (see Draft EIR Exhibit 4.3-1); therefore, designing the project to maintain the 1-mile buffer would not likely avoid land use compatibility issues.

Another odor-related issue is the potential for increased solid waste generation to exacerbate the existing odor issue. Even if the CISGP excludes sensitive receptors within 1 mile of the landfill, because the CISGP includes several times more development than the SAP/PRSP, the solid waste generation associated with the CISGP would be greater than the SAP/PRSP. The Draft EIR states (page 4.3-50), “As odor generation is generally proportionate to the volume of waste generated and processed, the project would, at its peak, conservatively represent 16 percent of the odor currently generated at Western Regional Sanitary Landfill (WRSL), and at the time of landfill closure in 2058, it would represent approximately 8 percent of odor emissions.” The Draft EIR concludes that exacerbation of the existing odor impact is significant. The CISGP would contribute a larger percentage of solid waste and, consequently, a larger proportion of the odor generated at WRSL because it would add waste from 64,766 additional people and 41,520 additional housing units over the SAP/PRSP. Therefore, the CISGP would exacerbate the existing odor issue to a greater degree than the project and would result in a substantially more severe significant environmental impact.

Wetlands Impacts

Regarding impacts on wetlands, the CISGP does not identify the methodology used for determining the number of acres affected; however, it does not rely on the information presented in the Draft EIR. The Draft EIR’s method for calculating impacts on wetlands adheres to the method described in the Placer County Conservation Plan (PCCP). Furthermore, the impacts on wetlands identified in the Draft EIR for the PRSP are based on a wetland delineation that has been verified by the U.S. Army Corps of Engineers. Because the methodology used to determine these calculations in the CISGP is unknown, a direct “apples-to-apples” comparison of the data is not possible. However, it is illustrative to show the actual acreage calculation provided in the Draft EIR (for the category of impact that seems most analogous to the category presented in

the CISGP) compared to the acreage calculations provided in the CISGP. Table 3-3 provides a comparison of the acreages of the wetlands affected as presented in the Draft EIR versus the CISGP and shows that the SAP/PRSP would result in impacts to fewer acres of wetlands.

Table 3-3 SAP/PRSP and CISGP Wetland Impact Comparison

	SAP/PRSP (Numbers from Draft EIR)	SAP/PRSP (Numbers Assumed in CISGP)	CISGP	Difference (CISGP minus SAP/PRSP)
Acres of Direct Impact on Wetlands	2,617 ¹	3,923/3,515 ²	3,753/2,942 ²	1,136/898 ²

¹ Combined total from Draft EIR Tables 4.4-4 and 4.4-5 "Acres of Direct Impact" column. This total includes all aquatic resource types, not just vernal pools.

² The CISGP identifies two different sources for their totals: County Vernal Pool Map and Whitham & Vollmar Vernal Pool Map. The numbers identified from both sources are presented.

Sources: Placer County 2018; AEL 2019

Even if the CISGP would reduce the loss of acreage of vernal pool habitat, the loss of between 2,942 and 3,753 acres of vernal pool complex from the Western Placer Core Area would still be a significant impact with the same uncertainties about the availability of existing mitigation bank credits or sufficient land available from willing sellers to establish compensatory mitigation projects to fully mitigate the loss of wetland functions, especially within the Western Placer Core Area. Also, although the CISGP proposes wider setbacks to riverine/riparian complex areas, it would still result in a linear preserve network surrounded by urban development such that riparian habitat value would be diminished for most species and riparian habitat would be subject to the similar 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). Therefore, the impact conclusions would remain significant and unavoidable under the CISGP for the same reasons as for the proposed project. These reasons are stated under the "Significance after Mitigation" headings on pages 4.4-41 and 4.4-48 of the Draft EIR.

The CISGP also includes a lengthy comparison of the mitigation fees that would be required to mitigate impacts to wetlands. The PCCP fee analysis presented in the CISGP appears to have misapplied the draft PCCP Special Habitat (wetland) fees. The fee calculation applied the Vernal Pool Type Special Habitat fee to the gross acreage of land being converted from a natural/semi-natural land cover (vernal pool grassland complex) to urban uses, which would already be subject to a separate Valley Land Conversion fee. The draft Special Habitat fees are applicable only to directly/indirectly affected special habitats such as vernal pools, seasonal wetlands, streams, etc. Therefore, the CISGP overestimates the draft PCCP Special Habitat fees.

GHG and Air Quality Impacts

The CISGP is designed to reduce impacts related to GHG emissions and air quality. Table 3-4 compares the air pollutant, ozone precursor, and GHG emissions presented in the Draft EIR to the emissions reported in the CISGP. The methodology associated with the air pollutant and GHG emissions estimated for the CISGP are not described anywhere in the plan, nor are the activity data or emission factors shown. Conversely, the Draft EIR discusses in detail the methodology used to quantify emissions associated with the project in accordance with Placer County Air Pollution Control District (PCAPCD)-recommended methods. For example, because the thresholds of significance for air quality are in pounds per day, all emissions associated with the project were also reported in pounds per day in the Draft EIR. However, the CISGP incorrectly reports the emissions included in the Draft EIR in an annualized version and does not explain how the numbers presented in the Draft EIR were interpreted and annualized. For comparison purposes, Table 3-4 shows annualized emissions from the Draft EIR, which were calculated by multiplying the season with higher daily emissions by 365 days and dividing by 2,000 pounds per ton. This is considered conservative because it does not account for changes in the amount of emissions projected by season (i.e., summer vs. winter).

Table 3-4 SAP/PRSP and CISGP Air Pollutant and Greenhouse Gas Emissions Comparison

Pollutant (tons/year)	SAP/PRSP (Numbers from Draft EIR) ¹	SAP/PRSP (Numbers from CISGP)	CISGP	Difference (CISGP minus SAP/PRSP)
NO _x	151	792	966	815
PM ₁₀	356	17.8	22	-334
PM _{2.5}	213	15.8	19	-194
SO _x	N/A	7.6	9	N/A
CO	1,485	6,406	7,809	-6,324
ROG	1,017	603	734	-283
GHG (MTCO _{2e} /year)	579,522	2,035,936	2,176,091	1,596,569

Notes: N/A = not available; NO_x = oxides of nitrogen; PM₁₀ = respirable particulate matter; PM_{2.5} = fine particulate matter; SO_x = sulfur oxide; CO = carbon monoxide; ROG = reactive organic gas; GHG = greenhouse gas = MTCO_{2e}/year = metric tons of carbon dioxide equivalent per year.

¹ Emissions reported in Draft EIR are in pounds per day. To annualize, the season with higher daily emissions was multiplied by 365 and divided by 2,000.

Sources: Placer County 2018; AEL 2019

As shown in Table 3-4, the numbers assumed by the CISGP for the Draft EIR are considerably different, sometimes by a factor of 10 or more. This makes an equalized and therefore accurate comparison between the CISGP and the Draft EIR impossible. However, it is illustrative to compare the emissions presented in the CISGP with the emissions presented in the Draft EIR.

When comparing the project’s emissions assumed by the CISGP for the SAP/PRSP project and the CISGP itself, the CISGP exceeds the total amount of criteria air pollutant, ozone precursor, and GHG emissions. The CISGP claims that because the population in the CISGP would be greater than that of the project, the emissions generated per capita would be less and therefore create a lesser impact. This analytic approach does not appropriately consider PCAPCD’s thresholds. While PCAPCD has an efficiency threshold of GHG emissions per capita, PCAPCD proposed these thresholds for projects equal to or less than 10,000 metric tons of carbon dioxide equivalent (MTCO_{2e}) (PCAPCD 2016:C-4). Further, PCAPCD has different thresholds for residential and nonresidential land uses. Nonresidential land uses included in PCAPCD’s nonresidential efficiency threshold include general commercial, general office building, and general industrial. Because the project includes many nonresidential land use types that do not fit under these three categories (i.e., university, innovation center, and entertainment-mixed use), the appropriate threshold for the project is the bright-line threshold of 10,000 MTCO_{2e}. The CISGP states that annual GHG emissions at project buildout would exceed 2.1 million MTCO_{2e}. No mitigation is provided in the CISGP to reduce these emissions to meet the PCAPCD thresholds.

Ultimately, the CISGP would result in greater emissions of ozone precursors and GHG emissions in an area already in nonattainment for ozone. The impact associated with the CISGP would be greater than that of the project.

The CISGP also presents an analysis of carbon storage potential for both the CISGP and the project. Again, the CISGP does not provide the methodology used to derive the numbers presented. Carbon storage potential was not quantified in the Draft EIR because, as an area plan, the specific vegetation types and acreages prior to and after development are unknown; therefore, such quantification would be speculative.

Vehicle Miles Traveled

Using similar strategies to reduce mobile-sources of GHG emissions, the CISGP is designed to reduce per-capita VMT by creating a denser plan with more opportunities for transit and other alternative transportation modes. However, when the CISGP presents the differences in VMT between the CISGP and the SAP/PRSP, the methodology used in the CISGP is not consistent with the methodology used in the Draft EIR. The Draft EIR’s VMT analysis uses VMT per service population, whereas the CISGP uses VMT per capita. Per-capita VMT typically considers only the project’s residential population, whereas service population considers

residential population, as well as employment and university student population. However, the per-capita VMT numbers presented in the CISGP appear to account for more than just residential population. It is unknown what the CISGP considered in the per-capita VMT estimates. For these reasons, an accurate, comparison of VMT per service population or per capita is not possible. However, given the very high density of the CISGP, it is likely that the VMT per service population (and per capita) would be lower than the proposed project. Table 3-5 presents the VMT numbers presented in the CISGP and the Draft EIR.

Table 3-5 SAP/PRSP and CISGP VMT Impact Comparison

	SAP/PRSP (Numbers from Draft EIR)	SAP/PRSP (Numbers Assumed in CISGP)	CISGP ¹	Difference (CISGP minus SAP/PRSP)
Total Annual VMT	1.3 billion ²	2.7 billion	2.6 billion	1.3 billion
VMT per Service Population	12,465 ³	-	-	-
VMT per Capita	-	7,161	6,631	-

¹ No methods are provided for VMT estimates in the CISGP; therefore, the accuracy of these estimates cannot be verified. This comparison is provided for illustrative purposes.

² Daily project generated VMT from Draft EIR Table 4.4-32 converted to annual VMT (3,624,520 VMT/day x 365 days/year).

³ Daily VMT per service population from Draft EIR Table 4.4-32 converted to annual VMT per service population (34.15 VMT/service population/day x 365 days/year). This includes existing conditions.

Sources: Placer County 2018; AEL 2019

Although not as informative as service population or per-capita estimates, it is possible, for illustrative purposes, to compare the total annual VMT of the CISGP and the project. As shown in Table 3-5, the total annual VMT estimated for the CISGP is double the Draft EIR’s estimate for total VMT for the project. Even though the VMT associated with each resident and employee of the CISGP may be lower than the project, the overall VMT is substantially higher. Although the CISGP does not provide methodology or data to allow conclusive comparison, total VMT that is double the proposed project would likely translate into a greater volume of vehicles on local and regional roadways, which, in turn, would result in greater impacts related to congestion on roadways and intersections compared to the proposed project. (Although it is possible that the development intensity proposed by CISGP could internalize vehicle trips to a greater extent than the proposed project, no evidence is provided that the CISGP would achieve a level of internalization substantial enough that it would not result in increased roadway volumes and congestion compared to the project.)

For the CISGP to accommodate a greater volume of traffic, additional roadway and intersection capacity would be needed beyond what is included in the proposed project. The CISGP does not include any information regarding the sizing of the transportation facilities, so it is unclear how this additional capacity would be provided.

UTILITIES AND PUBLIC SERVICES

The CISGP does not include information regarding the sizing of other necessary infrastructure, such as water/wastewater distribution and treatment, drainage infrastructure and retention, and solid waste capacity. Regarding water supply and distribution, an increase in the level of development typically results in an increased demand for potable and recycled water and a need for larger distribution pipelines. It is unclear how the CISGP, which includes six times more residential units and double the amount of commercial/industrial floor area, would tie into existing water infrastructure and whether existing water supply mains are large enough to support that much additional development. Moreover, as discussed in the Draft EIR (page 4.15-43), full buildout of the SAP/PRSP would require the construction of the planned Ophir Water Treatment Plant, and, to ensure water treatment capacity is available, Mitigation Measure 4.15-2 requires that no small lot tentative maps shall be approved unless and until adequate water treatment capacity is identified. It is uncertain whether the planned Ophir Water Treatment Plant would have enough treatment capacity to serve a project as large as the CISGP with other planned development. Additional studies would be required to determine whether the CISGP could be supplied with water; regardless, the impact on water supply would be greater than that of the proposed project.

The same issue is true of wastewater treatment. The CISGP does not describe how it would tie into the existing wastewater conveyance system or how wastewater treatment would be provided for a development so much larger than the SAP/PRSP. The Draft EIR states (page 4.15-50) that the Pleasant Grove Wastewater Treatment Plant has sufficient capacity to treat wastewater flows from buildout of the PRSP area, but not from the combined PRSP and net SAP areas. Additional wastewater treatment expansions would be needed for full implementation of the SAP/PRSP. Given the fact that the CISGP includes several times more development than the SAP/PRSP, the impact on wastewater treatment capacity would be greater. Additional studies would be needed to determine the extent of the impact and whether future treatment plant expansions could increase capacity to serve the CISGP.

It is also unclear how the CISGP would provide adequate public services, such as police protection, fire protection, schools, and libraries. The CISGP does not mention new fire or police protection facilities. The Draft EIR for the SAP/PRSP (page 4.13-28) indicates that the project would require approximately 23 new sheriff officers to meet the County standard of 1.2 officers per 1,000 residents. Based on the population of the CISGP stated in the plan, the addition of 84,000 residents would require approximately 101 new sheriff officers. Similarly, the Draft EIR (page 4.13-24) indicates that the SAP/PRSP would require between 21 and 28 new firefighters to meet County standards. Using the same standards, the CISGP would require between 73 and 93 new firefighters. The CISGP does not identify new fire stations or sheriff stations or otherwise explain how this increased fire and police protection service demand would be met.

Regarding schools, the CISGP (page 42) identifies “urban elementary school,” “urban high school,” and “urban middle school” as part of the “buildings mix” in the Town Center District. The Draft EIR indicates that the SAP/PRSP would generate approximately 1,800 new elementary school students, 700 new middle school students, and 800 new high school students. However, the CISGP would generate more than 5,500 elementary school students, 1,800 middle school students, and 1,600 high school students. (These calculations assume a student generation factor based on 100 percent high-density residential, which is lower than the rate for low- and medium-family residential; therefore, to the extent that a portion of the CISGP housing is low- and medium-density, the student generation numbers would be higher.) For context, the proposed new elementary school in the PRSP would accommodate approximately 800 students and the new middle school in the PRSP would accommodate approximately 1,000 students. Therefore, to fully meet its demand for schools the CISGP would require seven new similarly sized elementary schools and two new similarly sized middle schools. The Draft EIR (page 4.13-32) reports that there is existing and planned capacity for 1,618 high school students. The CISGP would consume all current and planned high school capacity in the vicinity.

CISGP AS A PROJECT ALTERNATIVE

As discussed up to this point, the CISGP is designed to reduce impacts associated with the project, but the plan is likely infeasible on the basis of physical constraints as well as the CISGP’s inability to meet the project objectives. In addition, because it includes a much higher level of development, the CISGP would likely result in greater impacts on the environment compared to the SAP/PRSP, even though it might reduce some impacts due to its smaller development area. However, several commenters request that the CISGP be added to the Draft EIR’s analysis of alternatives; some commenters suggest that the CISGP be approved instead of the project. For all of the reasons described above, the CISGP is not considered a feasible alternative that could avoid or substantially reduce significant impacts associated with the SAP/PRSP. It is therefore not added to the Draft EIR’s analysis of alternatives. However, it is important to note that the Draft EIR already includes an alternative that shares many of the CISGP’s strategies for reducing project-related impacts.

Alternative 4: Reduced Footprint, Similar Development Potential was identified in the Draft EIR as an alternative that would achieve the same level of development as the SAP/PRSP, but, similar to the CISGP, would reduce the overall development area and would be designed to reduce impacts on biological resources by providing increased buffers to avoid hydrological features and other wetland areas. See Exhibit 3-4. Also, although Alternative 4 does not include areas that would remain designated specifically for

agricultural use (like the CISGP's Agricultural district), limited farming activities would still be allowed within the SAP Preserve/Mitigation Reserve areas; therefore, although the impact to Farmland would be slightly greater under Alternative 4 than the CISGP, agricultural practices could continue within large portions of the net SAP area.

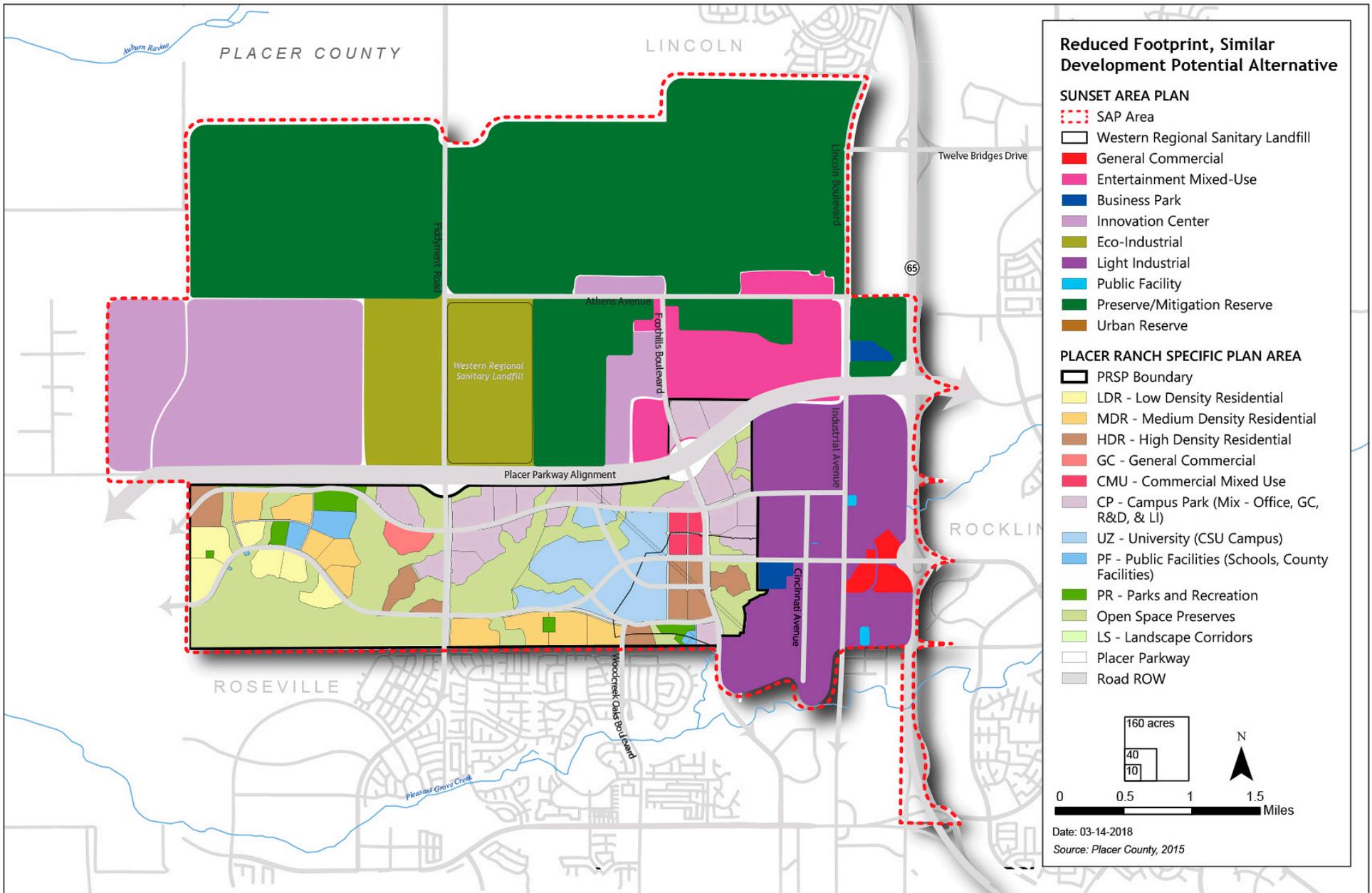
The Draft EIR indicates that Alternative 4 would remove nearly 1,500 acres of developable land from the project area. The combined development area of the SAP/PRSP would be approximately 5,500 acres. (Note that the development area for the SAP area cannot be accurately estimated because SAP policies require open space buffers to be incorporated into individual developments, and the specific amount cannot be determined at this time.) The removal of 1,500 acres of developable land would decrease the development area to approximately 4,000 acres. Based on the calculations provided in the CISGP for "development area" (page 48), this means Alternative 4 would develop just over 300 acres more than the CISGP. As mentioned above, the CISGP uses the SIA Plan boundary, which is more than 300 acres smaller than the Alternative 4 boundary. Therefore, the difference in the disturbance area between the CISGP and Alternative 4 equates roughly to the difference in plan area size, and the overall level of disturbance, acre-for-acre, would be similar.

Also similar to the CISGP, but not to the same extent, Alternative 4 would result in more compact development than the SAP/PRSP and would therefore have a lower per-capita VMT and per-capita GHG emission (although the overall emission of GHG and overall level of traffic impact would be similar to the project, as described in Chapter 6 of the Draft EIR, and less than the CISGP). However, Alternative 4 includes a more reasonable level of development than CISGP and a wider variety of housing options, including low density residential housing.

For the reasons described above, Alternative 4 is considered a more feasible and more reasonable alternative that achieves similar impact reductions for some environmental issue areas and more effective impact reduction for other environmental issue areas. The only exception is the impact to Farmland, for which the CISGP would result in a slightly lower level of impact; however, the impact to Farmland associated with both the CISGP and Alternative 4 would remain significant after mitigation.

Unlike the CISGP, Alternative 4 includes a potentially viable university site, located within the PRSP area (and therefore potentially still able to be donated) on land that is currently undeveloped (and therefore not constrained by existing structures and property ownership issues). Alternative 4 would therefore not conflict with primary objectives related to the Sac State–Placer Center.

After CCR Section 15204 describes the helpfulness of comments that suggest additional alternatives or mitigation measures that avoid or mitigate significant environmental effects, it indicates that reviewers should, at the same time, be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. The County acknowledges the substantial effort and thought put into the CISGP. County staff examined the various aspects of the CISGP that targeted significant impacts to determine if there were elements that could be incorporated into the project or one of the alternatives. However, as described above, the feasibility issues, especially the issues with the university site and the sheer magnitude and intensity of urban development, as well as the inability to meet primary project objectives, cause the CISGP, and even the separate elements of the CISGP, to fail as a viable alternative to the proposed project. In addition, as discussed above, the CISGP would actually result in greater impacts associated with several of the significant impacts the plan seeks to reduce, most notably traffic and GHG emissions. Finally, the Draft EIR includes Alternative 4, which aims to reduce environmental impacts associated with ground disturbance, especially biological resources, in a similar fashion as the CISGP, but, unlike the CISGP, would not generate significantly greater levels of GHG emissions. The County considers Alternative 4 to be a more reasonable and effective alternative to the project. Therefore, the County is not revising the Draft EIR to include the CISGP as an alternative to the project.



Source: Mintier Harnish 2018, MacKay & Soms 2018

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Exhibit 3-4

Alternative 4: Reduced Footprint, Similar Development Potential



3.1.3 Master Response 3: Placer County Conservation Program and Mitigation

Several comments were received that raised issues concerning the PCCP. Comments primarily focused on the Draft EIR's use of the PCCP, which has not yet been adopted, but the public review draft EIR/EIS was circulated for public review between June 21, 2019 and August 20, 2019, and may serve as a feasible permitting/mitigation approach. To provide clarity, this master response provides additional overview of the PCCP, as well as a status update. This response also explains how the Draft EIR identifies the PCCP as a mitigation approach, but also identifies an alternative mitigation approach if the PCCP is not adopted or is otherwise not available as a permitting and mitigation strategy for individual development projects.

As described in the Draft EIR (page 4.4-28), the PCCP includes two separate but complementary plans or programs that support two sets of state and federal permits:

- ▲ The Western Placer County Habitat Conservation Plan and Natural Community Conservation Plan, referred to as the HCP/NCCP or Plan, is a joint HCP and NCCP that would protect fish and wildlife and their habitats and fulfill the requirements of the federal Endangered Species Act (ESA), California Endangered Species Act (CESA), and California Natural Community and Conservation Planning Act (NCCP Act).
- ▲ The Western Placer County Aquatic Resources Program, referred to as the CARP, would protect streams, wetlands, and other water resources and fulfill the requirements of the federal Clean Water Act (CWA) (Sections 404 and 401) and analogous state laws and regulations.

The purpose of the PCCP is to protect and enhance ecological diversity and function, including aquatic resource functions and values in western Placer County while allowing appropriate and compatible growth in accordance with applicable laws. To this end, the Western Placer County HCP/NCCP describes how to avoid, minimize, and mitigate effects on endangered and threatened species, thereby addressing the permitting requirements relevant to these species for activities conducted in the PCCP area by the Permittees. The PCCP also describes the responsibilities associated with operating and maintaining the new habitat reserves that will be created to mitigate anticipated effects resulting from growth and development activities.

In addition, the Western Placer County In-Lieu Fee Program is a program under which compensatory mitigation requirements under Section 404 of the CWA can be fulfilled by payment of a fee. The In-Lieu Fee Program would provide wetland mitigation "credits" that can be used to fulfill Section 404 compensatory mitigation requirements. The In-Lieu Fee Program would provide compensatory mitigation for impacts on aquatic resources for all projects and activities that are covered under the HCP/NCCP and the CARP.

Further, the CARP provides a means to fulfill the requirements of federal, state, and local laws that protect aquatic resources using the HCP/NCCP's comprehensive, long-term, regional conservation strategy. This regional strategy focuses authorized impacts on aquatic resources near or within existing urban areas and away from rural, intact natural areas, thereby avoiding and minimizing impacts on aquatic resources on a regional scale. The CARP uses a watershed approach to identify intact watersheds for conservation, creation, and establishment of aquatic resources, while authorizing development in watersheds that are already degraded and fragmented by development. This comprehensive regional approach to aquatic resource conservation and mitigation in western Placer County provides a greater level of landscape- and watershed-scale protection of aquatic resources than is possible with project-by-project permitting under the federal CWA Sections 404 and 401, and the California Fish and Game Code 1602 programs. The SAP/PRSP is considered a Covered Activity under the HCP/NCCP and, with compliance with appropriate avoidance and minimization measures, the project will be able to mitigate impacts through the PCCP, if the program is approved.

Under the HCP/NCCP, in order to qualify as avoided land (and therefore not subject to PCCP fees), an area must meet applicable habitat requirements as well as at least one of the six PCCP avoidance criteria (whereas public comments implied that all six of the criteria must be met, including being at least 200

contiguous acres). For example, if an area is less than 200 acres in size it can still be considered avoided land not subject to fees as long as it is connected to the stream system. Under the PCCP, a determination of avoidance will be made by the agencies with jurisdiction over the project. Although land that has been deemed avoided is not subject to fees, qualifying as “avoided” does not necessarily mean that the land is suitable for incorporation into the Reserve System in lieu of fee payment. If the avoided land is proposed for inclusion into the Reserve System, the state and federal Wildlife Agencies must review and approve inclusion, and inclusion would need to be supported by site-specific study and planning.

As mentioned above, the Draft EIR presents two possible paths forward for biological impact mitigation: (1) permitting/mitigation under the PCCP, pending its approval by the Board of Supervisors and issuance of state and federal regulatory permits, and (2) traditional project-specific regulatory permitting/impact mitigation, if the PCCP is not approved, or otherwise remains unimplemented. The PCCP may be considered for adoption by the Placer County Board of Supervisors as early as the end of 2019 or early 2020. If the public review draft PCCP is approved and the program implemented prior to the project being independently granted state and federal regulatory permits, the project would be subject to the PCCP’s landscape-scale regional conservation strategy and avoidance, minimization, and mitigation measures.

The Draft EIR provides participation in the PCCP as an option for permitting and mitigating project impacts on biological resources covered under the PCCP should it be adopted and available, by the time future projects are implemented. Participation in the PCCP would be the preferred mitigation approach and is required under SAP policy and PRSP development standards, if it is available when individual projects are implemented, because it provides a comprehensive landscape-level approach to conservation that would result in a large, interconnected preserve system to better ensure long-term survival and protection of covered species and habitat. However, 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 U.S. Army Corps of Engineers programmatic permits, are not adopted or are not available as a permitting and mitigation strategy for future projects.

Under the traditional project-by-project permitting regime (i.e., standard state CESA and Fish and Game Code Section 1602 and federal ESA, 404, and 401 permitting), wetland and habitat mitigation, both on- and off-site, would require the preparation of mitigation plans for approval by the state and federal regulatory agencies. Implementation of these plans under state and federal permits and compensatory mitigation requirements would ensure mitigation is provided consistent with state and federal laws. Depending on their specific circumstances, future mitigation plans may be subject to CEQA/National Environmental Policy Act and may require additional project-level analyses; the potential effects of these plans would be too speculative at this time to predict in a meaningful way.

In the absence of the PCCP, impacts on wetland and riparian habitats and stream zones are mitigated through implementation of the following SAP policies and mitigation measures:

- ▲ Policy NR-2.4: Stream Habitat Mitigation,
- ▲ Policy NR-2.5: Setback Area Protection and Maintenance,
- ▲ Policy NR-3.1: Sensitive Habitat Buffers,
- ▲ Policy NR-3.3: Stream Corridor Encroachment,
- ▲ Policy NR-3.4: Stream Corridor Natural Conditions,
- ▲ Policy 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.

Impacts on western spadefoot and federally listed vernal pool invertebrates are mitigated through implementation of Mitigation Measures 4.4-3a, which requires surveys for western spadefoot in suitable habitat and collection and relocation of western spadefoot and their egg masses to suitable habitat that will be preserved in perpetuity, and Mitigation Measure 4.4-3b, which requires compensation for loss of vernal

pool invertebrate and western spadefoot habitat in such a manner that that there will be no net loss of habitat. Mitigation Measure 4.4-a would mitigate impacts on valley elderberry longhorn beetle in the absence of the PCCP, by requiring surveys for elderberry shrubs and avoidance of or compensation for valley elderberry longhorn beetle habitat according to the U.S. Fish and Wildlife Service 2017 Framework. Impacts on special-status reptile, bird, and mammal species are mitigated through implementation of Mitigation Measures 4.4-5a, 4.4-5b, 4.4-5c, 4.4-5d, and 4.4-5e, which would require surveys for and avoidance of individuals, nests, occupied roosts, or other active breeding sites of special-status reptile, bird, and mammal species (western pond turtle, burrowing owl, loggerhead shrike, white-tailed kite, northern harrier, Swainson's hawk, tricolored blackbird, song sparrow, grasshopper sparrow, pallid bat, Townsend's big-eared bat, and American badger), and compensation for any unavoidable loss of occupied burrowing owl habitat and Swainson's hawk foraging habitat.

Therefore, alternative mitigation is presented for each biological resource impact in the event the PCCP is not available as a mitigation strategy. In most cases, these mitigation measures, like participation in the PCCP, would reduce significant impacts to a less-than-significant level. SAP policies and Mitigation Measures 4.4-1a, 4.4-1b, 4.4-3a, 4.4-3b, and 4.4-3c are expected to reduce significant impacts on wetlands and other waters of the United States, waters of the state, and federally listed vernal pool invertebrates, 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 mitigation bank 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, as described in the Draft EIR, these impacts would remain significant and unavoidable. If the PCCP is approved by the state and federal agencies and is adopted and implemented in time to support development within the PRSP and net SAP areas, it would likely reduce significant impacts to a greater degree than project-by-project mitigation by developing a large, managed and monitored reserve area that will provide wetland and species habitat restoration, open space and agricultural conservation in perpetuity, rather than smaller, more fragmented and isolated reserves surrounded by urban development.

3.1.4 Master Response 4: Odors

ODOR IMPACT THRESHOLDS OF SIGNIFICANCE

An issue was raised in public comment on the Draft EIR that the result of one of the studies in Draft EIR (Appendix J, SCS Engineers Odor Studies) describes odor impacts in terms of the number of times that the dilutions to threshold (DT) metric is exceeded. To clarify, the DT metrics referenced in Appendix J are not used in the Draft EIR as significance thresholds under CEQA. State CEQA Guidelines Section 15064.7 describes a threshold of significance as "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant." The Draft EIR on page 4.3-50 contains an explanation of the dilutions to threshold metrics and how they are used in the Draft EIR:

Intensity of odor impact is often expressed in terms of dilutions to threshold (D/T or DT), which defines odor in terms of how much fresh air would have to mix with the odorous air such that half of the population could no longer detect the odor. The unit DT can also be thought of as the detection threshold (DT). Odor is considered likely to be offensive when it exceeds 10 DT, may be offensive when it exceeds 8 DT, and is sometimes offensive when it exceeds 5 DT. While these values have been used by some entities as nuisance standards and as design values in odor modeling, odor impacts are still subjective and highly variable. Neither Placer County nor PCAPCD has adopted nor subscribes to any specific scheme of odor standards or thresholds.

Therefore, the Draft EIR does not use exceedances of a numeric threshold in making a significance determination for odor impacts. This approach is widely accepted: Rather than relying on a numeric

threshold solely based on concentrations or levels of odor, a more holistic evaluation is the norm for determining significance under CEQA. For example, the City of San Diego guidance states that “the significance of potential odor impacts should be based on what is known about the quantity of the odor compound(s) that would result from the project’s proposed use(s), the types of neighboring uses potentially affected, the distance(s) between the project’s point source(s) and the neighboring uses such as sensitive receptors, and the resultant concentration(s) at the receptors” (City of San Diego Development Services Department 2011). The San Joaquin Valley Air Pollution Control District’s recommended threshold for odor is “[b]ased on distance of odor source from people and complaint record for [the] facility or [a] similar facility.” The threshold is “[m]ore than one confirmed complaint per year averaged over a three-year period, or three unconfirmed complaints per year averaged over a three-year period” (SJVAPCD 2012). The Sacramento Metropolitan Air Quality Management District states that “[d]ue to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, there are no quantitative or formulaic methodologies to determine the presence of a significant odor impact,” and “Lead Agencies should consider all available pertinent information...to qualitatively determine if a significant odor impact could potentially occur” (SMAQMD 2016). Finally, the South Coast Air Quality Management District threshold for odor is whether the project creates an odor nuisance pursuant to SCAQMD rules (SCAQMD 2019).

The Draft EIR’s standard of significance for a significant odor impact, as noted on page 4.3-21, is whether the project would create an objectionable odor affecting a substantial number of people. The Draft EIR contemplates the findings of the study in Appendix J in determining whether the impact would be significant. Draft EIR page 4.3-50 presents the following study findings:

- ▲ Project-generated waste processed and disposed of at WRS� would contribute to odor impacts in the vicinity.
- ▲ The project would cause the number of exceedances of specific odor levels (likely offensive, may be offensive, and sometimes offensive) to increase.
- ▲ The project would, at its peak, conservatively represent 16 percent of the odor currently generated at WRS�. At the time of landfill closure in 2058 (assuming, conservatively, buildout of the project over 20 years), it would represent approximately 8 percent of odor emissions.

Therefore, considering the conclusions of the studies in Appendix J, the Draft EIR concludes on page 4.3-50 that this impact would be significant.

ODOR CONTROL MITIGATION

Several commenters listed mitigation measures they thought should be evaluated in the Draft EIR, including payment of a fair share for odor control at the WRS�, development of a biosolids and wood waste processing facility, improved leachate management, and increasing capture efficiency of landfill gas. The Draft EIR identifies feasible measures to reduce odor impacts. On page 4.3-52, the Draft EIR states:

While mitigation for odor issues would be beyond the control of Placer County, feasible measures are available to WPWMA, which owns and operates WRS� and MRF, including composting operations. WPWMA is already engaged in assessment, research, and pilot studies designed to minimize odors to the degree feasible. The following are examples of measures that either have been, or can and should be, adopted by WPWMA (CEQA Statute Section 21081; State CEQA Guidelines Section 15091):

- ▲ **Implement Revised Composting Methodology.** To reduce odors associated with composting operations, the greatest source of objectionable odors at WRS�, WPWMA can and should implement a revised composting methodology, consisting of either aerated static pile (ASP) technology; covered (CASP) technology, in which ASPs are covered with an organic or synthetic cover; and/or partial or total enclosure of the composting operation. If CASP technology is employed, VOC emissions could be reduced by approximately 72 percent, substantially reducing objectionable odors (SCS Engineers 2018:18).

- ▲ **Minimize Use of Fines as Alternative Daily Cover.** Use of fines derived from municipal solid waste (MSW) and the materials recovery facility (MRF) as alternative daily cover (ADC) can generate more objectionable odors than the MSW waste stream because of its large surface area and potential to generate odorous gases. To reduce odors associated with composting operations, WPWMA can and should minimize use of fines as ADC to the degree feasible, and should cover MRF and MSW fines with MSW, soil, or other daily cover to reduce odor emissions from fines used overnight as ADC.
- ▲ **Immediately Cover or Bury Sludge Waste.** To reduce odors associated with sludge received by WRSL from the Roseville Wastewater Treatment Plant (WWTP), WPWMA can and should immediately cover or bury sludge waste. This practice can prevent sludge from off-gassing for extended periods and reduce odorous emissions that may migrate offsite.

The Draft EIR further explains on page 4.3-52 that “because these specific measures are beyond the jurisdiction of Placer County, and because the nature, degree, and effectiveness of future odor control measures that may be implemented by WPWMA are unknown, odor impacts resulting from the project would be **significant and unavoidable.**”

In further response to the Draft EIR and as a result of continued engagement with Placer County, WPWMA retained a consultant to identify and prioritize odor reduction measures at WRSL, and estimate costs for their implementation, and ongoing operation and maintenance. (See Technical Report #2, prepared by CE Schmidt and TR Card on August 2, 2019, included as Appendix I.) Technical Report #2 describes odor control/response measures for four major areas of landfill operation and activity: (1) compost operations, (2) landfill operations, (3) materials recovery facility (MRF), and (4) site-wide technologies and operations. Measures are categorized into four implementation tiers, prioritized by effectiveness at odor reduction and estimated implementation costs for each measure.

Authority staff, working with the Technical Report consultants, further refined and prioritized the measures, and proposed a package of measures that would achieve up to a 90 percent reduction in odor emissions. These measures are detailed in correspondence from Robin R. Baral, Churchwell White, LLP, on behalf of the Authority, dated August 22, 2019 (Appendix I). The letter promotes specific Tier 1 and Tier 2 measures—those deemed most effective—for composting, landfill, and site-wide operations, but notes that Tier 3 and Tier 4 measures, because of their marginal benefit and significant implementation costs, are not proposed. Similarly, the Authority does not propose many of the mitigation measures related to the MRF, as they would not be cost-effective, and MRF contributions to overall odor emissions are relatively insignificant (R. Baral, personal communication, August 22, 2019).

Tier 1 measures proposed by the Authority for composting operations include positive aerated static piles (ASP) and associated Best Management Practices (BMPs), annual odor emissions testing, and construction of a mixing building (within which food waste would be received and blended with green waste) fitted with a biofilter for scrubbing ventilated air. While the Authority notes that it is already planning to implement ASP (a measure also described and recommended in the Draft EIR), it suggests that BMPs would be required as an additive measure to ensure that the desired level of odor reduction is achieved. Tier 2 measures for composting operations include implementing ASP on cured compost, increased and improved aeration of the leachate treatment ponds, and monthly odor testing to identify issues with the Tier 1 BMPs and any other needed operational changes.

Tier 1 measures proposed by the Authority for landfill operations address both the active landfill face and the inactive landfill/gas collection operations. The former includes application of odor neutralizers to sorted refuse and to the active landfill face, and additional landfill BMPs (such as limiting the size of the active face). Those for the inactive landfill/gas collection include increased screening to identify and repair landfill gas “hot spots,” and optimize well field density and configuration, and enhanced landfill gas collection. Tier 2 measures for landfill operations include use of Posi-Shell landfill cover (or equivalent), which forms a protective crust over the landfill; use of foam or other odor neutralizer for continuous cover of the active landfill face; and additional landfill gas monitoring.

Site-wide technologies and operations related to odor control and management are also proposed by the Authority. Measures include enhanced monitoring through placement of odor sensors in the PRSP area, establishing an odor hotline, community outreach by the Authority's landfill operator, and planting trees with aromatic foliage around the WRS� perimeter.

Capital costs and annual maintenance costs for Authority-proposed measures are shown in Table 3-6.

Table 3-6 Authority-Recommended Odor Mitigation Measures

Measure	Capital Cost	Annual Cost
Tier 1 Measures: Composting Operations		
Aerated Static Piles	Authority funded	Authority funded
Compost Best Management Practices	\$0.00	\$100,000
Annual Odor Emissions Testing	\$0.00	\$100,000
Mixing Building with Biofilter Scrubber	\$2,000,000	\$0.00
Tier 2 Measures: Composting Operations		
ASP on Cured Compost	\$2,500,000	\$0.00
Improved Pond Aeration	\$200,000	\$10,000
Odor Testing and Operational Revisions	\$0.00	\$100,000
Tier 1 Measures: Landfill Operations		
Odor Neutralizers for Sorted Refuse	\$200,000	\$120,000
Odor Neutralizers for the Active Landfill Face	\$200,000	\$120,000
Landfill BMPs	\$0.00	\$100,000
Increased Screening	\$0.00	\$200,000
Enhanced Landfill Gas Collection	\$0.00	\$200,000
Tier 2 Measures: Landfill Operations		
Posi-Shell Landfill Cover	\$0.00	\$200,000
Odor Neutralizer for Continuous Cover of the Active Landfill Face	\$0.00	\$200,000
Additional Landfill Gas Monitoring	\$0.00	\$50,000
Tier 1 Measures: Site-wide Technologies and Operations		
Enhanced Monitoring/Modeling	\$200,000	\$0.00
Odor Hotline/Community Outreach	\$20,000	\$100,000
Tree Planting and Maintenance	\$500,000	\$25,000

Sources: Technical Report #2, prepared by CE Schmidt and TR Card on August 2, 2019; R. Baral, personal communication, August 22, 2019

All told, Tier 1 measures are estimated to cost \$3,120,000 for new capital facilities and \$1,065,000 in annual operational costs and would reduce odor emissions at the WRS� by approximately 70 percent compared to existing baseline conditions, and 35 percent compared to estimated 2058 conditions, the projected year of landfill closure and conservative estimate of project buildout. Tier 2 measures would cost \$2,700,000 in new capital facilities and \$560,000 in annual operational costs and would reduce odor emissions at the WRS� by approximately 18 percent compared to existing baseline conditions, and 9 percent compared to estimated 2058 conditions. Combined, Tier 1 and Tier 2 measures would require \$5,820,000 in new capital expenditures and \$1,625,000 in annual operation and maintenance costs. The Authority expresses confidence that collectively, these measures would achieve odor emissions reductions of up to 90 percent compared to existing baseline conditions and up to 50 percent compared to conditions in 2058, reducing cumulative odor impacts to less-than-significant levels.

While WPWMA characterizes the slate of Tier 1 and Tier 2 measures as “the Authority’s proposed odor mitigation measures for the Sunset Area Plan/Placer Ranch Specific Plan Draft EIR,” it would be neither feasible nor reasonable that costs for all Authority-proposed odor reduction measures be borne by the project. As described in the Draft EIR at pages 4.3-6 through 4.3-11, objectionable odors are currently generated at WPWMA facilities, odor complaints are regularly lodged, and odors are an existing issue. Moreover, residents and businesses in the project area, like others around the landfill, will pay garbage collection fees, recycling fees, and applicable tipping fees to WPWMA to support landfill operations, including odor control.

Although Placer County has not independently verified the efficacy or cost estimates of measures proposed by WPWMA, it acknowledges that, by virtue of the Authority’s comprehensive assessment of odor control measures necessary to reduce odors by up to 90 percent compared to the existing baseline and up to 50 percent compared to the 2058 estimate, and their costs, the Authority has developed the foundation for potential odor reduction mitigation applicable to the SAP/PRSP project area and other areas that may be subject to objectionable odors from the facility, and to which the project could contribute. Upon development of a methodology to apportion fair-share costs to regional development and agreement by participating entities to participate in mitigation funding, WPWMA will have the ongoing revenue necessary to implement, operate, and maintain its proposed slate of Tier 1 and Tier 2 measures to achieve the stated goal.

Even in the absence of an existing or foreseeable WPWMA fee program, Placer County recognizes its responsibility to mitigate for odor impacts resulting from additional waste generation and the reduced buffer to the extent it is feasible to do so both from a land use and a CEQA perspective. As to the land use policies, the County in consultation with WPWMA representatives has made the following revisions to the proposed General Plan and SAP Development Standards:

The GPA Buffer proposal will be modified *from* what was proposed in the December 2018 SAP: 2,000 feet with a footnote stating that the buffer could be reduced to 1,000 feet with approval of a specific plan, master plan or development agreement, *to*: 2,000 feet with a footnote stating that new residential uses beyond 2,000 feet but within 1 mile of the landfill property boundary require approval of a specific plan, master plan, or development agreement. A footnote will also be included in the SAP policy document (in addition to the General Plan) and will reference the SAP development standards section.

The SAP development standards will be augmented to require:

- (a) recordation of landowner acknowledgment/notice of proximity of landfill and potential odors, and
- (b) fair-share payment to WPWMA for Tier 1 capital improvements for odor control, as stipulated in development agreements. The fair-share payment shall be based on the proportion of the total SAP/PRSP residential unit capacity represented by the new residential units in a given project. Payment shall be remitted at building permit issuance.

(Note: Commercial and recreational uses within buffer distances of 1,000 feet and 500 feet, respectively, may still be considered on a case-by-case basis with approval of a specific plan, master plan, or development agreement [See Draft EIR Exhibit 3-27 and Placer County General Plan Table 1-5, which have both been revised as shown in Chapter 2, “Revisions to the Draft EIR”; and SAP Table 1-3].)

To determine a fair-share mitigation cost, the County first considered the estimated proportion of the waste stream to be contributed by project development at buildout, and thus, overall odor attributable to the project. As summarized on pages 4.3-49 and 4.3-50 of the Draft EIR and described in greater detail in the September 27, 2018 study by SCS Engineers, “Evaluation of Incremental Odor Increase from Western Regional Sanitary Landfill” (Draft EIR Appendix J), the project would, at its peak, conservatively represent 16 percent of the odor currently generated at WRSL and, at the time of landfill closure in 2058 (conservatively assuming buildout of the project over 20 years), approximately 8 percent of odor emissions (see Table 5, SCS Engineers 2018, Draft EIR, Appendix J). The estimate by SCS assumes no change in odor management practices at WRSL.

The County then considered the costs for Tier 1 measures (not including ASP, which the Authority plans to implement), which include those for landfill, composting, and site monitoring operations, in determining the project's fair-share contribution. The aforementioned WPWMA correspondence identifies that Tier 1 measures (including aerated static pile/compost best management practices, annual odor emissions testing, mixing building with biofilter scrubbing, and active landfill face and inactive landfill/gas collection measures) would reduce sitewide odor emissions by approximately 70 percent when compared to existing baseline, and by 35 percent when adjusted to estimated 2058 conditions (R. Baral, personal communication, August 22, 2019), over four times the levels attributable to the entirety of the proposed project.

Next, the County considered the fair share to be linked to the number of residential units that could be located in the Sunset Area as a whole, and between the Authority and the County, devised a fair share apportionment of the non-Authority-funded Tier 1 costs for each residential project proposed within the zone between 2,000 feet and 1 mile from the landfill boundary. This apportionment is based on the number of residential units proposed in a given residential project and the proportion of total capacity that number represents. Therefore, as a partial compensatory measure, Placer County will require the non-Authority-funded Tier 1 improvement costs to be apportioned between PRSP, net SAP, and other future projects as follows:

The fair share payment of the non-Authority-funded Tier 1 capital improvements (estimated at \$3,120,000) is to be apportioned over projects with residential units in the SAP/PRSP area that are proposed in the zone between 2,000 feet and 1 mile from the landfill property, measured from the landfill property boundary. The following calculates the fair-share payment for PRSP and identifies the future fair-share payment obligation for the net SAP area.

Fair share payment for PRSP is estimated at \$2,172,513 based on a total of 5,636 residential units (approximately 70 percent of the residential capacity of the project as a whole). Payment will be apportioned by residential units (not including university housing) and the first 2,154,879 square feet of non-residential uses (over a 30-year absorption period). Payment will be required upon issuance of the building permit.

The fair share payment for the net SAP area is estimated at \$947,487. Payment will be apportioned by residential units in future projects proposed in the zone between 2,000 feet and 1 mile from the landfill, measured from the landfill property boundary. Payment shall be required upon issuance of the building permit. Residential unit capacity in the Net SAP totals 2,458, or approximately 30 percent of the residential capacity of the project as a whole. The payment obligation is triggered by future projects and is not a present obligation of the County.

The Authority also requested that Placer Ranch project proponents pay an annual contribution to WPWMA for maintaining the Tier 1 facilities in the amount of \$1,050,000. It is the County's position that ongoing operation and maintenance of odor-control equipment and odor-reduction programs should be funded through revenue generated by the Authority from regular sources: garbage collection fees, recycling fees, and applicable tipping fees paid by ratepayers, including future residents and business owners in the project area. However, PRSP has agreed to a good-faith, one-time payment of approximately \$290,000 toward operation and maintenance costs for odor control measures. When added to the \$3,120,000 for capital expenditures for odor control described above, it can be reasonably determined that the payment is sufficient to mitigate for odor impacts associated with reducing the existing buffer.

Therefore, in response to comments received by the Authority and others, the County has revised the Draft EIR to include mitigation that identifies and prioritizes the odor improvement measures identified by the Authority, many of which are also described in the Draft EIR and in comment letters, as described above. The Draft EIR has also been revised to explain that although a fee program does not currently exist to implement the Authority-proposed odor-reducing actions identified in Mitigation Measure 4.3-6a, WPWMA has created the foundation of such a program, and can and should apply a reasonable methodology to apportion costs for any additional needed capital investments (beyond those funded by the project) and ongoing operation and maintenance to create a bona fide fee program. In advance of such a program, PRSP project

proponents will make a one-time, good-faith monetary contribution to Tier 1 maintenance in the amount of approximately \$290,000, which will be apportioned by residential units (not including university housing) and to the first 2,154,879 square feet of non-residential uses (over a 30-year absorption period). Payment will be required upon issuance of the building permit. Upon development of a fee program by WPWMA, the County will require other proponents of projects within the net SAP area to contribute in accordance with established methodologies.

The discussion titled, "Mitigation Measures," on pages 4.3-51 through 4.3-52 of the Draft EIR is revised as follows:

Mitigation Measures

Reducing the 1-mile buffer around WRSL to accommodate development is an element of the proposed project. One approach to mitigation, as stated in the State CEQA Guidelines Section 15370, is to avoid the impact altogether by not taking a certain action or parts of an action. Placer County acknowledges that maintaining the 1-mile buffer, which would be a feature of the no-project alternative (see Chapter 6, "Project Alternatives") would reduce impacts by reducing the exposure of people to objectionable odors. However, after careful consideration, Placer County has determined that this measure would prevent the County from achieving its project objectives to provide for diversity of development in the project area (including postsecondary education facilities and employment-generating uses and associated residential development), provide a diversity of housing types, create a balanced mix of land uses, establish a site for a CSU, meet the County's regional housing needs allocation, ensure economic viability, and achieve consistency with the Sacramento Region Blueprint.

~~Another common approach to mitigating regional issues involves establishment of a regional mitigation fee program whereby fees are collected on a pro-rata basis from program beneficiaries and then spent on meaningful improvements that specifically reduce the impact in question. Placer County considered the merits of such a program to address odor impacts of the project but determined that establishment of a mitigation fee program would be infeasible. To establish such a program, performance standards would need to be developed to determine program objectives; specific improvements that would achieve the standards would need to be identified; cost estimates for construction, operation, and maintenance of those improvements would need to be developed; the type and geographic scope of fee program participants would need to be established; the pro-rata share per given development unit would need to be defined; and administrative processes and procedures would need to be crafted. Because there is no program currently in place; odor impacts are subjective, highly variable, and weather dependent; and because odor management and abatement are the responsibility of WPWMA, this mitigation approach would be infeasible.~~

While direct mitigation for odor issues would be beyond the control of Placer County, feasible measures are available to WPWMA, which owns and operates WRSL and MRF, including composting operations. WPWMA is already engaged in assessment, research, and pilot studies designed to minimize odors to the degree feasible. The following ~~are examples of mitigation measures either have been, or can and should be,~~ adopted by WPWMA (CEQA Statute Section 21081; State CEQA Guidelines Section 15091):

Mitigation Measure 4.3-6a: Implement odor-reducing measures at the Western Regional Sanitary Landfill

WPWMA developed a slate of odor reduction measures it estimates will reduce WRSL odors by up to 90 percent compared to the existing baseline and up to 50 percent compared to estimated odors in 2058, the projected year of landfill closure and conservative estimate of project buildout. Measures apply to composting operations, landfill operations, and site-wide technologies and operations. Capital costs and costs for ongoing operation and maintenance of the measures were also estimated. (See Technical Report #2, prepared by CE Schmidt and TR Card, dated August 2, 2019, and correspondence from Robin R. Baral, Churchwell White, LLP, on behalf of the Authority, to Clayton Cook, Placer County Counsel, dated August 22, 2019.)

These measures, while not expressly proposed by WPWMA as the basis of a regional mitigation fee program, could logically serve that function. To develop a program, the Authority can and should take the additional steps to determine the type and geographic scope of fee program participants, the pro-rata share per given unit of development, and processes and procedures to administer the program. Based on information provided by WPWMA, the specific odor-reducing measures to be implemented under the program could include:

- ▲ **Implement Aerated Static Pile (ASP) Technology and Compost Best Management Practices (Tier 1, Composting Operations).** To reduce odors associated with composting operations, the greatest source of objectionable odors at WRSL, WPWMA can and should implement a revised composting methodology consisting of aerated static pile (ASP) technology in which air flow is induced through the material without turning or mixing. According to WPWMA, implementation of this measure is already planned for implementation. To ensure optimal odor reduction, best management practices (BMPs, e.g., anaerobic digestion of food waste) and training are also needed.
- ▲ **Conduct Annual Odor Emissions Testing and Implement Response Actions (Tier 1, Composting Operations).** To ensure maximum composting odor reduction, odor emissions testing is required on an annual basis to monitor odors and implement appropriate response if target reductions are not being achieved.
- ▲ **Construct and Operate a Mixing Building with Biofilter (Tier 1, Composting Operations).** To reduce odors associated with food waste composting, a mixing building fitted with a biofilter for air scrubbing should be constructed. The building would be a relatively small structure within which food waste would be received, blended with shredded green waste, then transferred to the ASP system where it would undergo controlled composting.
- ▲ **Apply Odor Neutralizers to Sorted Refuse (Tier 1, Landfill Operations).** To reduce landfill-related odor emissions, odor neutralizers should be applied to sorted refuse between transfer from the materials recovery facility (MRF) to the landfill site. This measure involves initial implementation of a spray system and ongoing application of neutralizer.
- ▲ **Apply Odor Neutralizers to Active Landfill Face and Implement BMPs (Tier 1, Landfill Operations).** To reduce landfill-related odor emissions, odor neutralizers should be applied to the active landfill face. Like that for sorted refuse, this measure involves initial implementation of a spray system and ongoing application of neutralizer. BMPs, such as limiting the size of the active landfill face, would optimize odor neutralizer operations.
- ▲ **Increase Screening of Landfill Gas and Implement Response Actions (Tier 1, Landfill Operations).** Quarterly screening for fugitive landfill gas should be conducted to identify “hot spots” of landfill gas emissions through interim and final landfill covers. Such screening would reduce the time between identification and repair of surface hot spot emissions, and thus odor.
- ▲ **Enhance Landfill Gas Collection (Tier 1, Landfill Operations).** To reduce landfill-related odor emissions, WPWMA should establish stricter protocols for landfill gas collection. Because landfill gas must be used, flared, or stored in a leak-free container, minimizing odorous emissions would involve operating the system for maximum containment of gas rather than maximum cost-effective performance of the gas-to-energy system.
- ▲ **Implement Enhanced Monitoring and Modeling (Tier 1, Site-wide Technologies and Operations).** To monitor odor emissions in areas around the WRSL, odor sensors should be placed in developed areas surrounding the landfill to identify odor spikes or other abnormal odor emissions, ideally before community complaints are lodged. Updates to the Authority’s dispersion modeling capabilities should also be implemented to better predict the nature, location, and intensity of odor issues.

- ▲ **Establish Odor Hotline and Implement Community Outreach (Tier 1, Site-wide Technologies and Operations).** An odor hotline should be established to allow the public ready access to WPWMA staff who will receive community complaints and concerns, and to provide timely response actions.
- ▲ **Establish Tree-lined Perimeter of WRSL (Tier 1, Site-wide Technologies and Operations).** Trees with aromatic foliage, such as pine or eucalyptus, should be planted around WRSL to visually screen the landfill from surrounding areas, providing psychological benefits, and to serve as a windbreak, thereby impeding, absorbing, or otherwise altering the flow of odorous emissions from the facility.
- ▲ **Implement Compost Curing Controls (Tier 2, Composting Operations).** To further reduce compost-related odor emissions, ASP techniques, described above for raw compost, can and should be used on cured compost.
- ▲ **Improve Pond Aeration (Tier 2, Composting Operations).** Leachate collected from composting activities is rich in organic compounds and therefore odorous, especially in anaerobic conditions. To further reduce odor emissions from the ponds, leachate should be aerated to increase aerobic digestion of organic compounds and reduce fugitive odors.
- ▲ **Implement Monthly Odor Testing and Response Actions (Tier 2, Composting Operations).** Monthly odor testing should be implemented to ensure odor reduction measures for active and cured compost are functioning as expected and to implement corrective actions as needed.
- ▲ **Apply Posi-Shell Landfill Cover (Tier 2, Landfill Operations).** Posi-Shell is an enhanced form of landfill cover that uses a blend of clay, fibers, and polymers to produce a spray-applied mortar that dries in the form of a thin durable stucco. Posi-Shell, or similar membrane cover, should be applied to reduce landfill-related odor emissions.
- ▲ **Implement Continuous Cover on Active Landfill Face (Tier 2, Landfill Operations).** Odor-neutralizing foam or similar product should be used on the active landfill face during fill operations to reduce landfill-related odor emissions.
- ▲ **Conduct Additional Landfill Gas Monitoring and Implement Response Actions (Tier 2, Landfill Operations).** Additional monitoring should be conducted to ensure that landfill gas leaks and emissions are not occurring in the above-ground system during gas collection and response actions implemented to correct such leaks if they are discovered.
- ▲ ~~**Implement Revised Composting Methodology.**~~ To reduce odors associated with composting operations, the greatest source of objectionable odors at WRSL, WPWMA can and should implement a revised composting methodology, consisting of either aerated static pile (ASP) technology; covered (CASP) technology, in which ASPs are covered with an organic or synthetic cover; and/or partial or total enclosure of the composting operation. If CASP technology is employed, VOC emissions could be reduced by approximately 72 percent, substantially reducing objectionable odors (SCS Engineers 2018:18).
- ▲ ~~**Minimize Use of Fines as Alternative Daily Cover.**~~ Use of fines derived from municipal solid waste (MSW) and the materials recovery facility (MRF) as alternative daily cover (ADC) can generate more objectionable odors than the MSW waste stream because of its large surface area and potential to generate odorous gases. To reduce odors associated with composting operations, WPWMA can and should minimize use of fines as ADC to the degree feasible, and should cover MRF and MSW fines with MSW, soil, or other daily cover to reduce odor emissions from fines used overnight as ADC.

- ~~**Immediately Cover or Bury Sludge Waste.** To reduce odors associated with sludge received by WRS from the Roseville Wastewater Treatment Plant (WWTP), WPWMA can and should immediately cover or bury sludge waste. This practice can prevent sludge from off-gassing for extended periods and reduce odorous emissions that may migrate offsite.~~

The following mitigation measure is within the authority of Placer County and shall be implemented:

Mitigation Measure 4.3-6b: Require fair-share contribution to WPWMA for odor mitigation

As described in the Draft EIR at pages 4.3-6 through 4.3-11, objectionable odors are currently generated at WPWMA facilities, odor complaints are regularly lodged, and odors are an existing issue. It would be neither feasible nor reasonable for all odor mitigation costs to be borne by the proposed project. Therefore, based on the Authority-proposed measures, their costs, and a reasonable methodology to determine a fair-share contribution, Placer County shall require the proponents of the Placer Ranch Specific Plan to contribute a total payment of \$2,465,273 to the Western Placer Waste Management Authority for purposes of funding odor reduction measures that will reduce odor impacts resulting from development within the Placer Ranch Specific Plan area.

The payment required of Placer Ranch Specific Plan proponents is based on: (1) the cost of non-Authority-funded Tier 1 odor control measures, apportioned by the number of residential units that could be developed in the zone between 2,000 feet and 1 mile of the landfill, measured from the landfill property boundary, and (2) a fair-share proportion of annual maintenance costs converted to present value over a 30-year absorption period, also apportioned by non-university residential units. Because odors are an existing issue, and because the entire project (PRSP and net SAP) would conservatively generate approximately 16 percent of odorous emissions compared to baseline conditions and 8 percent of odorous emissions in 2058 (estimated year of landfill closure and conservative estimate of project buildout), the proposed contribution for both capital expenditures and maintenance costs is considered conservative, that is, it more than compensates for the impact of the project. Costs include \$2,172,513 in capital investment, plus approximately \$290,000 for a one-time, good-faith contribution to operation and maintenance costs of the measures over a 20-year period. (The details and assumptions involved in the calculation of capital funding are described in greater detail in Master Response 4: Odors of the Final EIR.)

In addition to the fair-share contribution for odor mitigation required of PRSP, Placer County will require fair-share contribution by other future residential developments proposed in the net SAP area in the zone between 2,000 feet and 1 mile of the landfill, measured from the landfill property boundary. Based on the Authority's comprehensive assessment of odor control measures, their efficacy, and costs, it is expected that WPWMA can and should develop a bona fide regional fee program to which proponents of regional development projects will contribute to implement, operate, and maintain odor control measures.

Significance after Mitigation

As noted above, WPWMA is engaged with the community regarding odor management, is assessing the viability of odor-reducing approaches through pilot studies and is actively planning facility and operational improvements as part of its Renewable Placer Waste Action Plan to address regional growth, regulatory requirements, and other goals and objectives, including odor control. WPWMA's identified odor reduction actions (Mitigation Measure 4.3-6a) are estimated to reduce WRS odors by up to 90 percent compared to the existing baseline and up to 50 percent compared to estimated odors in 2058. However, the State CEQA Guidelines state that "[m]itigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments" (Section 15126.4[a][2]). Because direct implementation of the actions listed in Mitigation Measure 4.3-6a are beyond the jurisdiction of Placer County, they are infeasible for the County to implement. Fair-share contribution to such measures is the County's responsibility to enforce, however, and Mitigation Measure 4.3-6b would require a monetary contribution by Placer Ranch Specific Plan proponents and by future net SAP area developments to WPWMA for their odor impacts, and participation by other

projects, as applicable, in a regional mitigation fee program that can and should be developed by WPWMA for additional odor control measures and ongoing operation and maintenance. However, ~~because these specific measures are~~ full implementation of the odor control measures proposed by WPWMA is beyond the jurisdiction of Placer County, and because the nature, degree, and effectiveness of future odor control measures that may ultimately be implemented by WPWMA are unknown, odor impacts resulting from the project would be **significant and unavoidable**.

State CEQA Guidelines Section 15088.5(a) indicates recirculation “when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review...but before certification.” Section 15088.5(a)(3) indicates that recirculation is required if “[a] feasible...mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.” As described above and in the revisions to the Draft EIR, Mitigation Measure 4.3-6a is not feasible for Placer County to implement, and while Mitigation Measure 4.3-6b would serve to lessen the significant and unavoidable environmental impacts of the project, it would not reduce the impact to a less-than-significant level and, importantly, Placer County intends to adopt the measure. Therefore, the mitigation measures are not considered “significant new information,” and recirculation is not required.

LAND USE COMPATIBILITY

The City of Rocklin commented that the revised buffer zone standards will not adequately protect the WRSL. The City requests that the discussion acknowledge that the project would introduce new sensitive land uses near the WRSL. The City further states that given the buffer distance specified in General Plan Policy 4.G.11, the reduced buffer is incompatible with the County’s existing General Plan. Ultimately, the City requests that there be additional mitigation measures. WPWMA commented that the proposed buffer zone policy is inconsistent with the Placer County General Plan and that there is no reference to a landfill conservation easement requirement (per Placer County General Plan, Part 1, Land Use/Circulation Diagrams and Standards) in the Draft EIR. WPWMA also states that the Draft EIR does not discuss how the buffer reduction should be reconciled with the mandatory provision to conserve buffer zone land. WPWMA suggests more or functionally equivalent mitigation measures to reduce land use conflicts with the WRSL.

The “Land Use Buffer Zone Standards” section on page 18 in the County’s General Plan notes:

This General Plan requires the use of buffer zones in several types of development. While the exact dimensions of the buffer zones and specific uses allowed in buffer zones will be determined through the County’s specific plan, land use permit, and/or subdivision review process, buffer zones must conform to the following standards (as illustrated conceptually in Figures 1-3 through 1-6); provided, however, different buffer zone standards may be established within a Specific Plan as part of the Specific Plan approval.

This language clearly states that the buffers outlined in the General Plan Land Use Buffer Zone Standards are to be considered, applied, and determined through project review and that different buffer zone standards may be established within a Specific Plan. To that end, the PRSP and any future specific plan proposed within the Sunset Area may propose buffer zones that differ from what is illustrated in the General Plan.

The assertion that the project’s proposal to modify the General Plan sanitary landfill buffer zone is inconsistent with the “Buffer Zone Preservation” provision contained within the Land Use Buffer Zone Standard section of the General Plan is incorrect. As outlined above, when applying buffer zone standards through project review, the first step is to assess what buffer applies to the project. Following that determination and application of the applicable buffer zone for a project, the relevant buffer zone standards and related provisions contained within the Land Use Buffer Zone Standard section of the General Plan are then required to be “reserved and guaranteed in perpetuity through land acquisitions, purchase of development rights, conservation easements, deed restrictions, or similar mechanisms, with adjacent

proposed development projects providing the necessary funding.” The purpose of this provision is to protect and memorialize the established buffer zone after it has been applied to a project. Therefore, the project’s proposal to modify the sanitary landfill buffer zone is not inconsistent with this provision.

Notwithstanding, in response to questions and concerns, the proposed project no longer includes the potential for a buffer of less than 2,000 feet between residential uses and a solid waste disposal site and, for residential projects proposed in the zone between 2,000 feet and 1 mile of the landfill, measured from the landfill property boundary, a specific plan, area plan or development agreement will be required, as will adherence to the SAP development standards identified in this response. Commercial and recreational uses within buffer distances of 1,000 feet and 500 feet, respectively, may still be considered on a case-by-case basis with approval of a specific plan, master plan, or development agreement [See Draft EIR Exhibit 3-27 and Placer County General Plan Table 1-5, which have both been revised as shown in Chapter 2, “Revisions to the Draft EIR”; and SAP Table 1-3].

The Draft EIR requires implementation of Mitigation Measure 4.10-2 to reduce land use compatibility impacts. Mitigation Measure 4.10-2 requires odor control measures for specific plans, master plans, and development agreements for development within the PRSP area and net SAP area. These measures could include locating air intakes on the sides of buildings most distant from the WRSL; requiring a level of air filtration that exceeds Title 24 standards; and requiring written disclosures to initial and subsequent prospective buyers, lessees, and renters of properties. As described previously under “Odor Control Mitigation,” additional mitigation has been added in response to comments received on the Draft EIR. Mitigation Measure 4.3-6a recommends implementation of odor control measures at the WRSL and Mitigation Measure 4.3-6b would require a fair-share contribution to WPWMA odor mitigation. To reflect the new mitigation measures added in Section 4.3, “Air Quality,” to reduce objectionable odors, the first paragraph on page 4.10-18 of the Draft EIR is revised as follows:

Mitigation Measures

As described in detail in Section 4.3, “Air Quality,” Mitigation Measure 4.3-6a and Mitigation Measure 4.3-6b are available to mitigate odor impacts. Mitigation Measure 4.3-6a outlines measures proposed by WPWMA that should be implemented at the WRSL to reduce odors. Odor reduction measures include those pertaining to composting operations (e.g., ASP technology, odor emissions testing and response, mixing building with biofilter scrubbing), landfill operations (e.g., odor neutralizers, increased landfill gas screening and collection), and site-wide technologies and operations (e.g., enhanced monitoring and modeling, community outreach, and tree-lined perimeter). Mitigation Measure 4.3-6b would require a monetary contribution by the proponents of Placer Ranch Specific Plan to WPWMA for odor mitigation, and participation by future developers within the net SAP area who propose residential projects in the zone between 2,000 feet and 1 mile of the landfill, measured from the landfill property boundary. The County will also consider participation by future projects in a regional odor mitigation fee program that can and should be developed by WPWMA. measures available to Placer County to mitigate odor impacts (e.g., redesign of the proposed project, implementation of a regional mitigation fee program) would be infeasible, but feasible measures are available to WPWMA, which owns and operates WRSL and MRF, including composting operations. Such measures include revised composting methods, minimizing use of fines as alternative daily cover, and appropriate and timely handling of sludge waste (see Mitigation Measures subsection of Impact 4.3-6, Create objectionable odors affecting a substantial number of people).

As described on Draft EIR page 4.10-18, even with implementation of Mitigation Measure 4.10-2, impacts would remain significant because the “measure 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.” Impact 4.10-2 would therefore remain significant and unavoidable. In addition, as described above, Mitigation Measure 4.3-6a is infeasible for Placer County to implement, and while Mitigation Measure 4.3-6b would serve to lessen the significant and unavoidable environmental impacts of the project, the nature, degree and effectiveness of

odor control measures that may ultimately be implemented are unknown, so odor impacts remain significant and unavoidable. Therefore, the last paragraph on page 4.10-18 of the Draft EIR is revised as follows:

Significance after Mitigation

Mitigation Measure 4.10-2 would require implementation of measures in new development pursuant to proposed specific plans, master plans, or development agreements that would reduce perception of odor inside new structures and, to a lesser extent, outside new structures. These measures would potentially aide in increasing land use compatibility in the PRSP. However, this measure 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. Mitigation Measure 4.3-6a and Mitigation Measure 4.3-6b are also available for reducing odors at the WRSL. However, Mitigation Measure 4.3-6a is infeasible for the County to implement, and while Mitigation Measure 4.3-6b would serve to lessen the significant and unavoidable environmental impacts of the project, the nature, degree and effectiveness of odor control measures that may ultimately be implemented are unknown. Therefore, this impact would be **significant and unavoidable**.

State CEQA Guidelines Section 15088.5(a) indicates the need for recirculation “when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review...but before certification.” Section 15088.5(a)(3) indicates that recirculation is required if “[a] feasible...mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.” As described above and in the revisions to the Draft EIR, Mitigation Measure 4.3-6a is not feasible for Placer County to implement, and while Mitigation Measure 4.3-6b would serve to lessen the significant and unavoidable environmental impacts of the project, the nature, degree and effectiveness of odor control measures that may ultimately be implemented are unknown, and, importantly, Placer County intends to adopt the measure. Therefore, the mitigation measures are not considered “significant new information,” and recirculation is not required.

EFFECTS ON WESTERN REGIONAL SANITARY LANDFILL OPERATION

Commenters cite other facilities, both specific and in general, as examples of instances in which legal or regulatory action has been taken against landfills due to odors. One commenter, for example, referenced Newby Island Resource Recovery Park and Sunshine Canyon Landfill as facilities where “encroaching incompatible development has led to lawsuits and regulatory actions against solid waste facilities....” These actions have resulted in denials of expansion permits, significant financial ramifications, and abatement orders” (Comment 21-65). Another commenter claims “landfill expansions have constantly been the target of litigation, regardless of the investments made by those agencies, or their importance as assets to the community. Bringing additional residents closer to the landfill buffer will significantly increase the risk of additional lawsuits” (Comment 10-6).

First, it should be noted that several proposed policies are protective of the WRSL. The SAP contains Policy LU/ED-6.2, which states:

When considering land use changes near the Western Regional Sanitary Landfill and the Western Placer Waste Management Authority Material Recovery Facility (MRF) operation, the County shall consider the regional value of these solid waste facilities and operations. To protect these facilities and operations from incompatible encroachment, as well as to protect new uses from nuisances generated by the landfill and MRF, new development shall be reviewed and approved on a project-by-project basis, considering proximity to the active operation of these facilities and predicated on the new development’s ability to comply with the standards specified in Table 1-3 of this Plan.

SAP Policy LU/ED-6.3 states:

The County shall encourage businesses that are compatible with WPWMA land uses, such as businesses focused on the collection and conversion of waste, including but not limited to recycling, biomass, and production of organics for composting and mulching to be located in the Eco-Industrial District.

SAP Policy NR-5.7 states:

The County, in coordination with the PCAPCD, shall require the establishment of buffers and/or other appropriate mitigation on a project-by-project basis to provide for protection of sensitive receptors from sources of air pollution or odor.

The County agrees that bringing additional residents closer to the landfill could result in pressure for WPWMA to implement additional odor control measures. Impacts on the WRSL's operations are addressed in Draft EIR Impact 4.15-11. Impact 4.15-11 focuses on the potential impact on WRSL operations from incompatible land use, which may result in insufficient capacity to serve waste disposal needs. A portion of the analysis in Impact 4.15-11 refers to discussions under Impact 4.10-2; pages 4.10-16 and 4.10-17 under Impact 4.10-2 discuss Sunshine Canyon Landfill and Newby Island Resource Recovery Park in addition to three other facilities that have been the subject of complaints, lawsuits, and regulatory action in response to odor.

On Draft EIR page 4.10-16, it is noted that a settlement agreement for Newby Island Resource Recovery Park litigation in July 2016 does not require closure or preclude expansion of the facility, despite a commenter's claims in Comment 21-65 that actions have resulted in denial of expansion. For Sunshine Canyon Landfill, the other facility mentioned in Comment 21-65, Draft EIR page 4.10-16 describes an abatement order issued in March 2017 that prohibits large trash deliveries during certain hours, requires diversion of organic food waste, and requires better cover to control landfill gas emissions. Therefore, the Draft EIR recognizes that odor complaints can lead to real operational changes at landfills. Indeed, the Draft EIR concludes on page 4.10-17 that "[b]ased on these examples, it is likely that increased development in the vicinity of WPWMA's landfill will result in an increase in odor complaints which could lead to pressure for WPWMA to implement additional odor control measures."

To conclude with certainty which odor control measures would occur as a result of the project would be speculative and would not be reasonably foreseeable; therefore, they do not need to be evaluated under CEQA. Several sections of the State CEQA Guidelines are instructive on this issue. First, only indirect impacts that are reasonably foreseeable must be evaluated. Indirect impacts are those that are "not immediately related to the project, but [are] caused indirectly by the project" (Section 15064[d][3]). Second, "[a] change which is speculative or unlikely to occur is not reasonably foreseeable" (Section 15064[d][3]). And, finally, State CEQA Guidelines Section 15145 states that "[i]f, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact."

Impacts of the project on WRSL operations would be considered indirect impacts. The proposed project could result in increased odor complaints, which could then result in complaints or other actions that could then result in operational changes at WRSL. CEQA therefore requires these impacts only be analyzed if they are reasonably foreseeable. Within the Impact 4.15-11 discussion, the Draft EIR refers to the discussion in Impact 4.10-2 for "a discussion of the range of potential operational changes that may result from increased odor complaints." In summary, these are:

- ▲ prohibiting large trash deliveries during certain hours,
- ▲ diverting organic food waste,
- ▲ improving the cover to control landfill gas emissions,
- ▲ improving gas collection and well efficiency and integrity,
- ▲ paying households within a certain distance,
- ▲ stopping green waste composting or reducing odors from it,

- ▲ avoiding turning greenery and compost on weekends, and
- ▲ using sprinklers for dust control.

Under Impact 4.15-11, the Draft EIR concludes that, “in the most extreme scenario, [increased odor complaints could] result in enforcement action to alter WRSL operations such that odors are reduced (e.g., changing the timing, volume, and manner of handling odorous materials, such as compost and green waste; implementing additional odor-control features and technologies).” The Draft EIR states that the “most extreme potential change in operations...would be diversion of waste to another facility....” In the same impact discussion, the Draft EIR notes that denial of future expansion plans is a “possible, although unlikely, outcome....” To determine which of these scenarios would happen as a result of the project would be speculative. Indeed, the Draft EIR concludes on page 4.15-64 that “these scenarios [of waste diversion and denial of future expansion plans], though possible, are not likely, and evaluation of potential impacts that could result from these scenarios would be speculative....” The conclusion that these impacts are speculative is consistent with the State CEQA Guidelines sections on indirect impacts and speculation described previously.

Although comment 10-6 the conclusion that the analysis of potential risks to expansion would be speculative is not supported by substantial evidence, the Draft EIR provides justification for this conclusion. In addition to the analysis quoted and described previously, on page 4.15-64, the Draft EIR states:

As discussed in more detail in Section 4.10, “Land Use” (see Impact 4.10-2, “Consistency and compatibility with the Western Regional Sanitary Landfill), odor complaints related to land use inconsistency do not necessarily preclude landfill expansion. For example, although some operations of the Newby Island Recovery Park could be curtailed as part of a settlement agreement, the facility was still able to obtain a permit to expand. Additionally, despite odor complaints (many of which were eventually determined not to originate at the landfill), Chiquita Canyon Landfill was still allowed to expand. Therefore, based on existing and future operations at WRSL, and research into other similar facilities around the state, potential impacts on the WRSL and on waste disposal service would be **less than significant**.

The Draft EIR therefore explains why it is speculative to determine if the project would preclude expansion of the WRSL, relying on scenarios at two other landfills. To reflect the new mitigation measures added in Section 4.3, “Air Quality,” to reduce objectionable odors and to also make it clear that waste diversion requirements would be speculative, the second paragraph on page 4.15-64 of the Draft EIR is revised as follows:

As discussed in more detail in Section 4.10, “Land Use” (see Impact 4.10-2, “Consistency and compatibility with the Western Regional Sanitary Landfill), odor complaints related to land use inconsistency do not necessarily preclude landfill expansion. For example, although some operations of the Newby Island Recovery Park could be curtailed as part of a settlement agreement, the facility was still able to obtain a permit to expand. Additionally, despite odor complaints (many of which were eventually determined not to originate at the landfill), Chiquita Canyon Landfill was still allowed to expand. Of the landfills discussed, organic waste diversion was required for Sunshine Canyon Landfill. At Newby Island Recovery Park, the settlement agreement required either stopping of composting or reducing its odor. Therefore, diversion of waste would not necessarily occur as a result of increased odor complaints. Furthermore, the effects of odor complaints on operations varies among facilities. In summary, any of the following may or may not be implemented at the WRSL, based on the survey of other facilities described in Impact 4.10-2:

- ▶ prohibiting large trash deliveries during certain hours.
- ▶ diverting organic food waste.
- ▶ improving the cover to control landfill gas emissions.
- ▶ improving gas collection and well efficiency and integrity.
- ▶ paying substantially affected households.
- ▶ stopping green waste composting or reducing odors from it.

- avoiding turning greenery and compost on weekends, and
- using sprinklers for dust control.

Determining what measures would or would not be implemented at the WRSL would be speculative. Therefore, based on existing and future operations at WRSL, and research into other similar facilities around the state, potential impacts on the WRSL and on waste disposal service would be **less than significant**.

ODOR IMPACTS AND EFFECTS ON PCAPCD OPERATION

PCAPCD commented that “buildout of the SAP and PRSP Project will result in significant incremental increases of odor emissions and odor complaints due to its land use incompatibility.” To clarify, the Draft EIR does not conclude that the increase in odor complaints by itself would be a significant impact; rather, the Draft EIR focuses on any physical impacts that may result from an increase in odor complaints. For example, the Draft EIR concludes under Impact 4.10-2 that the increase in odor complaints could create pressure for the WPWMA to implement additional odor control and reduction measures, which is indicative of land use consistency and compatibility impacts. The effect identified in PCAPCD’s comment, however, is a purely economic impact. Indeed, PCAPCD claims only that the Draft EIR should “identify mitigation measures for...increased need for resources to deal with odor complaints[,] such as direct funding support to offset the costs for...additional services if the proposed project is approved.” And, “[a]dditional odor complaints received by the District will require resources for investigation, response, and resolution. The District may need to adopt and enforce additional odor control regulations to address the increased number of public complaints regarding odors from the WRSL.” The District claims that providing increased public services “will place a significant financial burden on the District,” with fees potentially passed on to other jurisdictions and potentially to ratepayers via solid waste service fees.

Impacts that are purely economic need not be addressed under CEQA. State CEQA Guidelines Section 15131(a) states that “[e]conomic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes.... The focus of the analysis shall be on the physical changes.” Section 15358 also specifies that “[e]ffects analyzed under CEQA must be related to a physical change.” Consistent with the CEQA principle that impacts involve physical changes in the environment, the State CEQA Guidelines Appendix G significance criterion for public services is whether the project would “result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities [or the] need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives....” Draft EIR page 4.13-19 lists the Appendix G significance criterion as a standard of significance for evaluating the project’s impacts.

As previously described in this master response, the County recognizes odor complaints may increase as a result of the proposed project. Draft EIR page 4.10-17 concludes that “it is likely that increased development in the vicinity of WPWMA’s landfill will result in an increase in odor complaints....” As previously discussed, mitigation has been added to the Draft EIR that, if implemented, could reduce odors from the WRSL. Mitigation Measure 4.3-6a outlines measures proposed by WPWMA that should be implemented at the WRSL to reduce odors. Odor reduction measures include those pertaining to composting operations (e.g., ASP technology, odor emissions testing and response, mixing building with biofilter scrubbing), landfill operations (e.g., odor neutralizers, increased landfill gas screening and collection), and site-wide technologies and operations (e.g., enhanced monitoring and modeling, community outreach, and tree-lined perimeter). Mitigation Measure 4.3-6b would require a monetary contribution by the proponents of Placer Ranch Specific Plan to WPWMA for odor mitigation, and participation by future developers of residential uses within the net SAP area in a regional odor mitigation fee program that can and should be developed by WPWMA. However, as explained previously, Mitigation Measure 4.3-6a is not feasible for Placer County to implement, and while Mitigation Measure 4.3-6b would serve to lessen the significant and unavoidable

environmental impacts of the project, the nature, degree and effectiveness of odor control measures that may ultimately be implemented are unknown. Therefore, substantial odor reductions may not occur. Odor complaints may be submitted to WPWMA or to PCAPCD or other agencies, at the discretion of the complainant; it is reasonable to conclude there is a possibility that PCAPCD would have to increase services to respond to an increased number of odor complaints.

The commenter does not identify a physical impact that would result from the potential increased financial burden on the District, and the County is not aware of a physical impact that would emanate from increased level of effort by PCAPCD to respond to odor complaints. PCAPCD does not indicate that additional facilities would be needed. It is also not possible to know how many complaints PCAPCD would need to investigate in the future, nor the increased level of staffing that may be needed at PCAPCD to address such complaints, or whether additional facilities—the construction and operation of which could result in environmental impacts—would be needed. It is, however, unlikely that so many additional employees would be needed that a new facility would need to be constructed, resulting in a physical impact on the environment. Therefore, no revisions have been made to the Draft EIR in response to this comment.

3.1.5 Master Response 5: Greenhouse Gas Mitigation

The Draft EIR evaluated impacts related to GHG emissions. Impact 4.7-2, “Operational greenhouse gas emissions” concludes that the potential project emission of GHG would be significant. The Draft EIR identifies a list of mitigation measures to reduce this impact; however, the Draft EIR concludes that after implementation of these measures, the impact would remain significant and unavoidable. Several comment letters suggested that the County consider additional GHG mitigation measures to be included in the Draft EIR. The County reviewed and considered each of these suggested measures. The discussion below categorizes each of the suggested mitigation measures based on whether they are already included in the project, could be included in the project, or are deemed infeasible and provides details regarding the County’s reasoning. The suggested mitigation measures are identified with the triangle bullets.

SUGGESTED GHG MITIGATION ALREADY INCLUDED IN DRAFT EIR

Transportation-Related GHG Mitigation Measures

The following transportation-related measures (shown in bold) were suggested by commenters to reduce GHG emissions:

- ▲ **Create car sharing programs. Accommodations for such programs include providing parking spaces for the car share vehicles at convenient locations accessible by public transportation.**

The following policy identified under the SAP would require preferred parking for such programs:

- SAP Policy TM-4.4: Preferred Parking for Vanpools and Alternatively-Powered Vehicles, which states, “The County shall require the provision of preferred parking for vanpools and alternatively-powered vehicles, including electric cars, natural gas vehicles, and hydrogen fuel cell vehicles.”

Because this policy requires preferential parking, this measure is included in the Draft EIR and would not require revisions to the Draft EIR. For a response to the car sharing program, see the response below under “Addressed by Transit Master Plan.”

- ▲ **Contribute funding to local and regional transit agencies.**

There are several policies identified under the SAP 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.”

Mitigation measures included in the Draft EIR require the project to contribute funding, including the following:

- Mitigation Measure 4.14-13a, on page 4.14-92 of the Draft EIR, states, “The County shall prepare a transit master plan for the SAP area, including the PRSP area.” This mitigation measure includes potential coordination with Placer County Transportation Planning Agency and Roseville Transit.
- Mitigation Measure 4.14-13b, on page 4.14-92 of the Draft EIR, 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.”

Because there are policies included in the SAP that require transit funding and mitigation measures included in the Draft EIR that require the funding and developing of a transit master plan for the area, this GHG mitigation measure has already been included in the project. No revisions are necessary to the Draft EIR.

▲ **Electric vehicle chargers for apartment use.**

Electric vehicle supply equipment (EVSE) (i.e., electric vehicle chargers) are required in multi-family residential buildings pursuant to Mitigation Measure 4.7-2a on page 4.7-20 of the Draft EIR, which states, “Multi-family residential buildings shall design at least 10 percent of parking spaces to include EVSE, or a minimum of two spaces to be installed with EVSE for buildings with 2-10 parking spaces. EVSE includes EV charging equipment for each required space connected to a 208/240-volt, 40-amp panel with conduit, wiring, receptacle, and overprotection devices.” This GHG mitigation measure has already been included in the project. No revisions are necessary to the Draft EIR.

Energy-Related GHG Mitigation Measures

The following energy-related measures (shown in bold) were suggested by commenters to reduce GHG emissions:

▲ **Site buildings to take advantage of shade, prevailing winds, landscaping, and sun screens to reduce energy use.**

The SAP Corridor Design Standards & Guidelines include the following related to siting buildings:

- Building orientation and fenestration should maximize natural daylighting and reduce cooling and heating loads.
- Orient buildings to maximize solar access, provide optimum daylighting and reduce energy costs.

These guidelines will be considered and incorporated when feasible for all project buildings. No revisions are necessary to the Draft EIR.

▲ **Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings.**

The following policy included under the SAP addresses efficient outdoor lighting:

- SAP Policy NR-6.8, “Energy Efficient Lighting,” which states, “Require the use of energy efficient lighting for all street, parking, and area lighting, to the extent feasible.”

Further, the 2016 California Energy Code has the following requirements for both residential and nonresidential buildings:

- Section 150.0(k) requires high-efficacy lighting in all residential buildings; and
- Section 130.1 Mandatory Indoor Lighting Controls requires daylighting and includes specifications for nonresidential and high-rise residential buildings.

The SAP Corridor Design Standards & Guidelines includes the following guideline related to daylighting:

- ▲ Orient buildings to maximize solar access, provide optimum daylighting and reduce energy costs.

Because of the requirements of the California Energy Code and SAP Policy NR-6.8, all lighting in the project would be energy-efficient and project buildings would be oriented to maximize daylighting. It is important to note that the 2016 California Energy Code is currently in effect and all project buildings were assumed to be built to the 2016 iteration of the code. However, based on the project schedule, all project buildings will be built to at least 2019 California Energy Code standards. The 2019 standards are anticipated to reduce energy consumption by 30 percent in nonresidential buildings, mostly due to lighting upgrades (CEC 2018). Further, future building code requirements are anticipated to include more stringent energy efficiency and renewable energy requirements. This GHG mitigation measure has already been included in the project. No revisions are necessary to the Draft EIR.

▲ **Install light colored “cool roofs,” cool pavements, and strategically-placed trees.**

Mitigation Measure 4.7-2a on page 4.7-21 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.

SAP Policy NR-5.9, “Cool Community Strategies,” 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.”

Further, SAP Corridor Design Standards & Guidelines includes the following standard related to cool pavement:

- Use light-colored paving surfaces to reduce urban heat island effect.

Because there is mitigation in the Draft EIR requiring the use of cool roofs on all project buildings, and SAP design standards require the use of cool pavement and trees, this GHG mitigation is already included in the project. No revisions are necessary to the Draft EIR.

▲ **Install energy-efficient heating and cooling systems, appliances and equipment, and control systems.**

The California Energy Code requires energy-efficient heating and cooling systems, as well as appliances. Further, as required by Mitigation Measure 4.7-2a on pages 4.7-20–21 of the Draft EIR, all low-rise and mid-rise residential project buildings must comply with the energy efficiency performance standards set forth in Tier 2 of the 2016 California Green Building Standards Code (CALGreen), Section A4.203.1.2.2. This mitigation measure also requires all nonresidential and high-rise residential project buildings to comply with the energy efficiency performance standards set forth in Tier 1 of CALGreen, Section A4.203.1.2.1.

CALGreen standards and energy efficiency are required through the following policies and guidelines:

- ▶ SAP Policy NR-6.3, “CALGreen,” which states, “The County shall require all new buildings shall comply with CALGreen building codes, including...heating and air conditioning standards...”
- ▶ SAP Corridor Design Standards & Guidelines: Building design should prioritize efficient energy usage through thermal insulation, shading devices, efficient HVAC systems, and photovoltaic panels.

Because all project buildings would be required to comply with CALGreen standards for energy efficiency, this GHG mitigation measure has already been included in the project. No revisions are necessary to the Draft EIR.

▲ **Install light emitting diodes (LEDs) for traffic, street, and other outdoor lighting.**

Several policies included in the SAP address energy-efficient lighting (such as LEDs), including:

- ▶ SAP Policy NR-6.8, “Energy Efficient Lighting,” which states, “Require the use of energy efficient lighting for all street, parking, and area lighting, to the extent feasible.”
- ▶ SAP Policy LU/ED-3.9, “Lighting,” which states, “Energy-efficient technology should be used wherever possible.”

In addition to these SAP policies, outdoor lighting associated with residential buildings would be required to be high-efficiency, pursuant to the California Energy Code, Section 110.9(e). No revisions are necessary to the Draft EIR.

▲ **Install energy-efficient heating, ventilation, and air conditioning. Educate consumers about existing incentives.**

Regarding energy-efficient systems, see the response to “Install energy-efficient heating and cooling systems, appliances and equipment, and control systems,” above. All future buildings constructed as a result of the project would be constructed to meet the current California Energy Code at the time of construction, which include energy efficiency requirements far more stringent than existing buildings. Existing incentive programs would not apply to new construction resulting from project implementation. No revisions are necessary to the Draft EIR.

▲ **No natural gas lighting. LED only with nighttime glare minimized.**

Natural gas is not permitted to be used for lighting pursuant to the California Energy Code because it is not high-efficacy lighting. No project buildings would include natural gas-fueled lighting.

LED lighting is one of several types of high-efficacy lighting that would be permitted under the California Energy Code. Several SAP policies and design guidelines address nighttime lighting and glare:

- SAP Policy LU/ED-3.9, “Lighting,” Section 6 states, “Lighting shall be designed to minimize projection into adjacent properties and onto adjacent roads and not provide a source of glare.”
- SAP Corridor Design Standards & Guidelines: All lighting shall be Dark Sky compliant.
- SAP Corridor Design Standards & Guidelines: Reduce night-time light pollution by shielding fixtures and directing light downward. Comply with County ordinances regarding light pollution, night sky requirements and fixture/lamp type(s).

Further, all nonresidential and high-rise residential buildings would comply with 2016 CALGreen standards, which includes a mandatory measure (5.106.8) that requires light pollution reduction associated with outdoor lighting. For these reasons, nighttime glare would be minimized, and high-efficacy lighting would be used. This GHG mitigation measure is included in the project. No revisions are necessary to the Draft EIR.

▲ **Drought-resistant trees that do not block solar.**

The following SAP policy addresses drought-resistant landscaping:

- SAP Policy LU/ED-3.8, “Landscaping,” which states, “All landscaping shall comply with the requirements of the WELO, including use of native species that are drought-resistant.”

Further, the SAP Corridor Design Standards & Guidelines identify native and drought-resistant plants that can be used for landscaping throughout the SAP area. Because there are policies addressing maximizing solar generation (see response above), it is not anticipated that trees would be planted that have the potential to block solar photovoltaics. For these reasons, this GHG mitigation measure is already included in the project. No revisions are necessary to the Draft EIR.

▲ **Solar photovoltaics in all parking lots.**

The following SAP policies address the installation of solar photovoltaics in parking lots:

- SAP Policy LU/ED-3.5, “Parking,” Section C states, “Where shade structures are provided, encourage the installation of solar panels.”
- SAP Policy NR-5.9, “Cool Communities Strategies,” Section C states, “Shading of hardscapes (such as sidewalks, roadways, and parking lots) with trees, vegetated trellises, or structures covered with solar panels or materials with high solar reflectance.”

Because there are policies in place to encourage the installation of solar panels in parking lots, and solar installation is required through Mitigation Measure 4.7-2a on pages 4.7-20–21 of the Draft EIR, this GHG mitigation measure is included in the project. No revisions are necessary to the Draft EIR.

Water-Related GHG Mitigation Measures

The following water-related measures (shown in bold) were suggested by commenters to reduce GHG emissions:

▲ **Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.**

The following SAP policies and Corridor Design Standards & Guidelines address water-efficient irrigation systems:

- SAP Policy PFS-3.2, “Efficiency and Demand Reduction,” Section B, “Requiring water-conserving landscaping and other conservation measures consistent with the Water Efficient Landscaping Ordinance...”

- SAP Policy NR-6.5, “Water Efficient Landscape Design,” which states, “The County shall require all new development to comply with the County’s Water Efficient Landscape Ordinance (WELo) to reduce water used for landscaping irrigation...”
- SAP Corridor Design Standards & Guidelines: Install “smart” or “intelligent” irrigation systems for all trees, shrubs, groundcovers, perennials, turf and ornamental grasses. Irrigation systems should be controlled by smart controllers with appropriate microclimate sensing capabilities.

The PRSP also includes water conservation measures in the utilities section of the plan, which states “Smart/Centrally Controlled Irrigation Controllers restrict irrigation to only the times and water application rates necessary to maintain landscaping. They account for water demand changes based on weather patterns and seasonal influences.”

Because of the requirements of the WELo and the numerous policies and design guidelines included in both the SAP and the PRSP, it is anticipated that all irrigation systems would be water-efficient. This GHG mitigation measure is included in the project. No revisions are necessary to the Draft EIR.

▲ **Design buildings to be water-efficient. Install water-efficient fixtures and appliances.**

Mitigation Measure 4.7-2a, on page 4.7-21 of the Draft EIR, states, “All project buildings shall comply with requirements for water efficiency and conservation as described in the 2016 California Green Building Standards Code, Division 4.3 and 5.3.”

Further, pursuant to Mitigation Measure 4.7-2a on pages 4.7-20 and 4.7-21 of the Draft EIR, all low-rise and mid-rise residential buildings would be required to comply with Tier 2 of the 2016 CALGreen standards, which include water conserving plumbing fixtures and fittings pursuant to Section 4.303.1. Nonresidential and high-rise residential buildings would be required to comply with Tier 1 of the 2016 CALGreen standards, which include water conserving plumbing fixtures and fittings pursuant to Section 5.303.3, and a 12 percent reduction for indoor potable water use in Section A5.303.2.3.1.

As shown above, this GHG mitigation measure is already included in the project. No revisions are necessary to the Draft EIR.

▲ **Implement LID practices that maintain the existing hydrologic character of the site to manage stormwater and protect the environment. Retaining stormwater runoff on-site can drastically reduce the need for energy-intensive imported water at the site.**

The following SAP policies and design guidelines address low-impact development:

- SAP Policy LU/ED-3.12, “Impervious Surfaces/Low-Impact Development,” states, “The County shall require that all new discretionary development be designed in accordance with the West Placer Storm Water Quality Design Manual to incorporate Site Design Measures and Low-Impact Development features to infiltrate runoff from impervious surfaces.”
- SAP Policy PFS-5.7, “Low-Impact Development,” states, “The County shall require that new development comply with the West Placer Storm Water Quality Design Manual to manage urban development runoff through the use of low-impact development (LID) features....”

As discussed in the policies listed above, detailed requirements for incorporating LID features are included in the West Placer Storm Water Quality Design Manual. These features are required by all new development projects.

Further, all nonresidential and high-rise residential buildings must comply with Tier 1 of the 2016 CALGreen standards, which includes low-impact development requirements stated in Section A5.106.3.

For these reasons, this GHG mitigation measure was included in the project. No revisions are necessary to the Draft EIR.

SUGGESTED GHG MITIGATION TO BE ADDED TO THE DRAFT EIR

Transportation-Related GHG Mitigation Measures

Several transportation-related GHG mitigation measures have been proposed in comments, including the following:

- ▲ Create car sharing programs.
- ▲ Create local “light vehicle” networks, such as neighborhood electric vehicles systems.
- ▲ Provide public transit incentives such as free or low-cost monthly transit passes.

As described above, the Draft EIR includes Mitigation Measure 4.14-13a that requires a transit master plan to be developed for the SAP area that “shall identify how transit service will be delivered to the SAP and ensure that the service adequately serves transit demand in the SAP” (page 4.14-92). Mitigation Measure 4.14-13b of the Draft EIR states that the transit master plan shall identify how transit service will be delivered to the PRSP area and will be prepared in collaboration with Placer County Transit and Placer County staff and submitted to the County for approval (page 4.14-92). The transit master plan that will be prepared for the project will address the demand for alternative modes of transportation and funding components. In response to these comments, Mitigation Measure 4.14-13a on page 4.14-92 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-13a: Prepare a transit master plan for SAP area (Net SAP Area and PRSP Area)

The County shall prepare a transit master plan for the SAP area, including the PRSP area. The transit master plan will be a County-led effort but may also be done in collaboration with PCTPA when PCTPA updates its Long-Range Transit Master Plan. Roseville Transit will also be consulted. The transit master plan shall identify how transit service will be delivered to the SAP and ensure that the service adequately serves transit demand in the SAP. Transit service could include but would not be limited to car-sharing programs, neighborhood electric vehicle systems, and free or low-cost monthly transit passes.

Energy-Related GHG Mitigation Measures

The following energy-related GHG mitigation measure (shown in bold) has been incorporated into Mitigation Measure 4.7-2a of the Draft EIR:

- ▲ **Use combined heat and power in appropriate applications.**

This suggestion identifies cogeneration facilities to reduce energy use associated with HVAC systems. Cogeneration facilities are typically applied in large commercial and institutional structures. These types of developments would be allowed under the SAP. It is possible that there may be opportunities for cogeneration facilities in the Sac State—Placer Center; however, the CSU would ultimately make the feasibility determination. Therefore, Mitigation Measure 4.7-2a of the Draft EIR is revised as follows to allow cogeneration as an option for reducing energy use:

- Commercial buildings (including multi-family residential structures four stories or higher) shall be designed to achieve a 10 percent or greater reduction in energy use compared to a standard 2016 Title 24 code-compliant building. Reductions in energy shall be achieved through energy efficiency measures consistent with Tier 1 of the 2016 California Green Building Standards Code, Section A5.203.1.2.1. Reductions can also be achieved by incorporation of co-generation facilities.

Alternatively, this could be met by installing on-site renewable energy systems that achieve equivalent reductions in building energy use.

Also, it should be noted that SAP Policy NR-6.7 has been revised as follows:

NR-6.7: Residential Energy Efficiency. The County shall ~~require~~ ~~encourage~~ ~~new~~ residential units to be designed ~~and constructed~~ to maximize energy efficiency. This ~~should~~ shall include ~~consideration~~ of the following design features:

- A. ~~Installation of solar photovoltaic systems~~ Pre-plumbing and structural design to accommodate solar energy systems.
- B. Installation of energy conservation appliances such as tankless water heaters and whole house fans in all residential units.
- C. Installation of energy efficient AC units and heating system with programmable thermostat timers, to the extent feasible.
- D. Use of low flow water fixtures such as low flow toilets and faucets, to the extent feasible.

SUGGESTED GHG MITIGATION DEEMED INFEASIBLE

Several GHG-reduction measures suggested by commenters were reviewed by the County and were deemed infeasible. These are discussed below. The Draft EIR has not been revised to include these measures.

Energy-Related GHG Mitigation Measures

The following energy-related measures (shown in bold) were suggested by commenters to reduce GHG emissions:

▲ **Limit the hours of operation of outdoor lighting.**

This suggested GHG mitigation measure does not specify what types of outdoor lighting should have limited operation hours. However, there are several SAP design guidelines and policies that encourage outdoor and night lighting to promote public safety and provide social opportunities, including the following:

- SAP design guideline: Public spaces should be well-shaded during the day and well-lit at night to encourage outdoor activities, site activation and security.
- SAP Policy LU/ED-3.9, "Lighting," states, "Lighting on site should be designed to promote pedestrian comfort and safety and to enliven public gathering spaces."

Further, there are many policies and design guidelines in the SAP and PRSP that require all lighting to be energy efficient. Because this measure would conflict with project policies and guidelines and because measures are already identified that require energy-efficient lighting, this measure is not included in the project and no additional revisions to the Draft EIR are necessary.

▲ **"Smart glass" electrochromatic windows.**

Electrochromic windows can reduce energy consumption by shading buildings from the sun. However, this type of technology can be prohibitively expensive. Further, all project buildings would be highly energy efficient, as they would be built to the latest iteration of the California Energy Code. As stated in the SAP Corridor Design Standards & Guidelines, "Building orientation and fenestration should maximize natural daylighting and reduce cooling and heating loads." It is unknown how much energy savings

would be possible for the addition of electrochromic windows. However, it is possible that future building occupants will choose to install this technology, but it is not included as required mitigation because all project buildings would be highly energy efficient and oriented to reduce cooling and heating loads.

Transportation-Related GHG Mitigation Measures

The following transportation-related measure (shown in bold) were suggested by commenters to reduce GHG emissions:

▲ **Build or fund a transportation center where various public transportation modes intersect.**

Placer County Transportation Planning Agency (PCTPA) assists local transit agencies, including Placer County, in developing short-term transit plans, and the long-range Transit Master Plan. These independent transit plans reflect changes in population, gaps in the transportation system, evaluate existing services, and analyze opportunities to provide more cost-effective transportation options. Due to the long buildout of the project, its transportation demands are not analyzed in the short-term transit plans. The population and associated transportation demand of the project was included in the long-range Placer County 2036 Regional Transportation Plan but there have been no capital projects identified to construct a transportation center in the project area. A transportation center would require substantial coordination with PCTPA, Placer County Transit, Roseville Transit, and other transportation agencies. As discussed in the Draft EIR, the project would be required to contribute funding to local and regional transit agencies. However, development of (or financial contribution to development of) a transportation center would not be feasible due to the current lack of planning for such a facility and the need for such a facility to be planned and coordinated with a multitude of other agencies.

Other GHG Mitigation Measures

The following other measures (shown in bold) were suggested by commenters to reduce GHG emissions:

▲ **Ban grass lawns for water conservation leading to less energy use.**

The PRSP includes the following water conservation measures for residential and nonresidential turf:

- Residential Turf Reductions: Typically, about 70 percent of a total residential front yard is assumed to consist of landscaping, with the remainder consisting of driveways, planters, or walkways. For the PRSP, limitations are to be placed on the landscaped portion of each yard, allowing up to 42 percent of the total area to be turf, with the remaining landscaped area comprised of low water use plant species that use between 65-75 percent less water than an average lawn.
- Turf Reductions in Non-Residential Parcels: where turf is incorporated into landscape design, it should be located in high-visibility areas and augmented by low-water-use plant species. Specific requirements for schools, parks, and roadways follow:
 - Parks – It is assumed that approximately 80 percent of a typical park’s square footage consists of landscaping. Within the PRSP, the total cumulative land area of all parks is to incorporate a maximum of 60 percent turf, leaving approximately 20 percent for low water use plant species and 20 percent for hardscape and other non-landscaped features. Utilizing less than 60 percent turf is acceptable provided the park can adequately provide all planned amenities, as depicted on the conceptual park plans provided in the Placer Ranch Design Guidelines.
 - Schools – It is assumed that approximately 70 percent of a school’s site square footage consists of turf. Within the PRSP, site design is to incorporate a maximum of 40 percent of site area for turf, leaving 30 percent for low water plant species and 30 percent for buildings and other hardscape/non-landscaped features.

- Roadways – It is assumed that approximately 15 percent of roadway corridors are comprised of landscaping. Within the PRSP, roadway corridor design is to incorporate a maximum of 5 percent of area for turf, leaving 10 percent for low water use plant species and 85 percent for roadway surface, sidewalks, and other non-landscaped features. It is assumed that Placer Parkway’s landscape corridors will not be irrigated.

These water conservation measures would substantially reduce the amount of turf allowed throughout the PRSP. Further, all landscaping in the SAP area must comply with the requirements of the Water Efficient Landscape Ordinance (SAP Policy LU/ED-3.8), which reduces landscape-related water use by promoting water-efficient landscapes, limiting turf, preventing wastewater, and incentivizing the use of graywater and recycled water in development projects. While the SAP and PRSP do not explicitly ban turf, there are many policies and requirements under the SAP and PRSP that would limit the amount of turf allowed and require water-efficient landscaping. For these reasons, this measure is not included in the project and no additional revisions to the Draft EIR are necessary.

- ▲ **Consider using compacted crushed rock for trails. It’s cheaper, faster, permeable, and produces less CO₂ emissions than concrete.**

All trails included in the SAP and PRSP are intended to use natural materials in open space areas of the SAP area, unlike the shared use paths. The shared use paths are intended to meet all Americans with Disabilities Act requirements and would be made with high-albedo concrete or other materials. No revisions to the Draft EIR are necessary.

3.1.6 Master Response 6: Drainage and Flooding

Several comments raise similar concerns related to the project’s stormwater retention. The most common concern relates to the fact that the Pleasant Grove Retention Facility, although an approved project, is not designed with capacity to meet the project’s need for volumetric stormwater retention, and that the Draft EIR identifies the Pleasant Grove Retention Facility for off-site stormwater retention. Comments suggest that it is inappropriate to identify a stormwater retention solution that is not approved. However, there appears to have been some confusion regarding the project’s retention strategy described in the Draft EIR, which indicates that the Pleasant Grove Retention Facility is not the only option available to meet the project’s stormwater retention needs. 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 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 is currently working to secure an easement. This easement has been secured since release of the Draft EIR. As such, the sixth paragraph on page 3-58 of the Draft EIR is revised as follows:

To minimize impacts associated with increases in stormwater volume within the Auburn Ravine watershed, 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 ~~is currently working to secure an easement~~ secured an easement on for flood control. A feasibility study has been conducted that confirms that any of these retention basin options could provide the needed capacity. Although the Lakeview Farms retention basin has undergone CEQA review and is available for retention, further project-level CEQA analysis would be required before the Scilacci Farms property could be used for retention purposes.

Therefore, several retention options are identified, including on-site retention. Therefore, the project is not dependent on implementation of the Pleasant Grove Retention Facility.

Other comments expressed concern related to the funding and timing of the Pleasant Grove Retention Facility relative to project implementation. The Draft EIR (page 3-58) states that using the facility 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. The Draft EIR states (page 3-69): "To ensure that a mechanism is in place to fund construction of the project's proportionate share of retention at the City of Roseville's Pleasant Grove Retention Facility, a fee program (or equivalent mechanism) would be required, and fees would be collected by the County with each building permit. At such time that adequate funds have been collected, retention facilities would be constructed with sufficient capacity to meet the project's stormwater retention needs. If the City and County are unable to memorialize a joint-facilities agreement (or equivalent mechanism), construction of equivalent retention facilities, whether on-site or elsewhere off-site, would be required. Lastly, interim on-site retention facilities may be developed unless or until the Pleasant Grove Retention Facility is online, to fully accommodate the project's long-term stormwater volumetric requirements."

Some comments indicated that Pleasant Grove Retention Facility is not an approved project and requires CEQA evaluation. Other comments acknowledge that the Pleasant Grove Retention Facility is an approved project, but indicate that, due to the fact that it does not have adequate volumetric retention capacity to accommodate stormwater increases associated with the project, the expansion should be evaluated in the Draft EIR. 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 SAP and PRSP areas and is included as part of the project. Although other alternatives are available, conveyance of project-site stormwater to this future expanded facility would best meet project objectives. The Draft EIR includes evaluation of impacts associated with the expanded 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.

3.1.7 Master Response 7: Program- vs. Project-Level Analysis

Several commenters critiqued the approach taken in the Draft EIR to analyze the SAP at a program level and the PRSP at a project level.

The State CEQA Guidelines contain guidance on when a program EIR may be prepared and describe the focus of a project EIR. As explained on Draft EIR page 1-2, State CEQA Guidelines Section 15168 states that "a program EIR may be prepared on a series of actions that can be characterized as one large project and, among other things, are related geographically or in connection with issuance of rules, regulations, or plans to govern the conduct of a continuing program." State CEQA Guidelines Section 15161 states that "a project EIR focuses on the changes in the environment that would result from a development project."

Although several commenters assert that calling an analysis “project level” or “program level” necessarily results in a requirement that the EIR contain a certain level of specificity, that is not the case. Indeed, in practice, the phrase “program EIR” is often used to refer to an EIR that presents a higher level of analysis with less detail, whereas the phrase “project EIR” is often used to refer to an EIR that presents a more detailed level of analysis. However, the name of the analysis—program or project level—does not ultimately dictate the specificity required in an EIR under CEQA. Instead, State CEQA Guidelines Section 15146, as noted on Draft EIR page 4-1, speaks to the degree of specificity necessary in an EIR: “The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.” In addition, importantly, Section 15146(a) continues:

An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy.

Section 15146(b) further states:

An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow.

A public comment on the Draft EIR (See comment 4-14) suggests that Section 15168(b) describes program EIRs as possibly providing for more exhaustive consideration of effects and alternatives than an EIR on an individual action in order to ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis. Contrary to the commenter’s suggestion that the Draft EIR “seems to imply” that a program EIR’s purpose is “to avoid detailed analyses,” Section 15168(b) merely lists potential benefits that use of a program EIR can provide; it does not dictate what contents a program EIR shall contain. Section 15168(b) states that “[u]se of a program EIR can provide the following advantages,” and “[t]he program EIR can” before listing several potential benefits (emphasis added). The use of the word “can” indicates that these are not requirements. To reiterate, the level of specificity in an EIR is not dictated in the State CEQA Guidelines by the name of the analysis—program or project—but instead by Section 15146 and the level of detail known about activities associated with the project.

Given CEQA requirements regarding the specificity of analysis in an EIR, the Draft EIR contains sufficiently detailed analysis of the SAP and PRSP. As explained in the Draft EIR on pages 4-1 and 4-2, the SAP and the Sac State–Placer Center portion of the PRSP are evaluated at a program level, whereas the PRSP (except for the Sac State–Placer Center) is evaluated at a project level. Therefore, in general, more detail can be provided for impacts of the PRSP, and less detail is provided about impacts of the SAP and the Sac State–Placer Center. Again, the level of detail required is dictated by Section 15146 rather than the name given to the analysis. And in cases where the level of detail of impacts identified for the PRSP and the SAP is similar, it follows that, for significant impacts, mitigation would also be the same.

3.1.8 Master Response 8: Recirculation

The County received comments stating it should revise and recirculate the Draft EIR for an additional round of public review and comment. This master response discusses the standards generally applicable to this issue and applies those standards to the comments requesting recirculation.

A lead agency is required to recirculate a Draft EIR when the agency adds “significant new information” to the EIR after the close of the public comment period but before certification of the Final EIR (PRC Section 21092.1; State CEQA Guidelines Section 15088.5). “New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement” (State

CEQA Guidelines Section 15088.5[a]). As outlined in Section 15088.5(a), “significant new information” includes information showing that:

- ▲ a new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;
- ▲ substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;
- ▲ a feasible project alternative or mitigation measure considerably different from that discussed in the Draft EIR would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it; or
- ▲ the draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

No new significant impacts have been identified in the Final EIR. Several new mitigation measures have been added (e.g., Mitigation Measure 4.3-6a), but the mitigation measures address significant impacts that were already identified in the Draft EIR, and no new or more severe significant impact would result from implementing the new mitigation measures. Additionally, the process of responding to comments has not resulted in the determination that an environmental impact identified in the Draft EIR has a substantially greater impact than that described in the Draft EIR. No new feasible alternatives have been added to the EIR. Although additional mitigation measures were added to the Draft EIR, the County has not declined to adopt them. Finally, the County believes that the Draft EIR is adequate under CEQA. For these reasons, recirculation is not required.

3.1.9 Master Response 9: Mitigation and Development Fees

Several comments raised questions regarding how various improvements and mitigation measures would be funded. These are addressed in individual responses to comments; however, this master response is provided to clarify the funding of improvements related to public services, transportation facility improvements, and the Pleasant Grove Retention Facility improvements.

Regarding the potential for the project to financially impact local public services, such as fire protection, police protection, and library services, the County has prepared a fiscal impact analysis and financing plan for the PRSP, pursuant to its General Plan Policy 4.B.6, which examines the impact on the project on County services. In addition, there are several mitigation measures identified which require the project to create or annex into a Community Facilities District or County Service Area zone of benefit or provide other funding mechanism to provide revenues to cover the cost of road maintenance, park maintenance, library services, and Countywide service that serve the development.

Regarding funding for traffic improvements discussed in the Draft EIR, the PRSP and development within the net SAP area will be required to pay Sunset Benefit District traffic fees, as well as 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. As stated in several of the traffic mitigation measures included in the Draft EIR, fair share funding for improvements at City of Roseville and City of Rocklin locations would be incorporated into the development agreement between Placer County and the landowner in the PRSP area. Placer County will work with the City of Roseville and City of Rocklin to determine this fair share fee. It should also be noted that the County is collecting traffic impact fees from development in the Dry Creek Benefit District, which will ultimately fund necessary traffic improvements in this area that are identified in the Draft EIR. Development within the PRSP and net SAP areas will also pay the Countywide Capital Facility Fee and annex into the Countywide Fire Facility Fee Program to mitigate impacts from new growth on countywide facilities and fire facilities that provide general governmental services and fire and emergency service to residents who live within the

unincorporated areas. Lastly, PRSP and net SAP development would be subject to any fees not otherwise mentioned but identified within the MMRP as well.

Regarding funding of the Pleasant Grove Retention Facility expansion, or other offsite regional retention facility as needed to retain drainage flows from the PRSP/SAP area, as stated in Section 2.3 of the Draft EIR, if the County or developer seeks to utilize the City of Roseville's Pleasant Grove Retention Facility, and an agreement has been negotiated between Placer County and the City of Roseville for such use, the applicants for individual projects would annex into the City of Roseville Regional Retention Basin fee district, or equivalent County fee program administered for such purpose, and pay the Pleasant Grove drainage retention fee, which would be calculated to cover the fair-share cost to accommodate the contribution of flows retained on behalf of each specific PRSP/SAP project. Costs to participate in the Pleasant Grove Retention Facility, or other offsite regional retention facility, would be dependent on an agreement with the City of Roseville, or formation of some sort of Joint Power Authority between Placer County and Roseville, as the basin is owned by the City of Roseville. Preliminary analysis was included within the EIR to demonstrate that the Pleasant Grove Retention Facility has the capacity, upon expansion, to handle additional retention demand for the PRSP/SAP area. Subsequent analysis may be needed for project level expansion of the facility at the time expansion is proposed; in the interim the fee program will continue to collect mitigation fees to be used for future facility expansion. For more details regarding the drainage options for the project, see Master Response 6: Drainage and Flooding.

3.2 RESPONSES TO INDIVIDUAL COMMENTS

3.2.1 Agencies

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWS

DEPARTMENT OF TRANSPORTATION
DISTRICT 3
703 B STREET
MARYSVILLE, CA 95901
PHONE (530) 741-4286
FAX (530) 741-4245
TTY 711
www.dot.ca.gov/dist3



*Making Conservation
a California Way of Life.*

February 22, 2019

GTS# 03-PLA-2016-00370
03-PLA-065 PM Var
SCH# 2016112012

Shirlee Herrington
Placer County Community Development Resource Agency
3091 County Center Drive, Suite #190
Auburn, CA 95603

Sunset Area Plan/Placer Ranch Specific Plan Project

Dear Shirlee Herrington:

Thank you for including the California Department of Transportation (Caltrans) in the environmental/application review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network.

The project proposes to update the 1997 Sunset Industrial Area (SIA) Plan. The proposed plan update, now called the Sunset Area Plan (SAP), identifies a higher density mix of labor- and employment-intensive uses with an emphasis on innovation and creativity. Nested within the SAP, the proposed Placer Ranch Specific Plan (PRSP) includes a mixed-use town center, commercial and office uses, a university site, and a diverse housing mix. The SAP, which includes the PRSP project site, encompasses 8,497 acres located in unincorporated south Placer County. The Plan area covers 13.9 square miles between the cities of Rocklin to the east, Roseville to the south, Lincoln to the north, and unincorporated Placer County to the west. The Plan area is located immediately west of State Route (SR) 65 which connects to Interstate 80 (I-80) in the south and SR 99 to the north. The proposed PRSP area includes 2,213 acres in the southern portion of the Sunset Area Plan. The southern boundary of the PRSP area is contiguous with the existing Roseville City limits, and the northern boundary is defined, in part, by the existing alignment of Sunset Boulevard West, west of Fiddymont Road. The following comments are based on the Draft Environmental Impact Report (DEIR) received.

Traffic Forecasting and Modeling

The SAP and PRSP are anticipated to develop over many years. The basis for identifying and mitigating foreseeable cumulative traffic effects in the 20-years horizon

1-1

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Ms. Shirlee Herrington, Placer County Community Development Resource Agency
February 22, 2019
Page 2

are mainly focused on the PRSP project.

The trips generated by the proposed project will be in the thousands. A Project-Only trip generation table should be provided to identify the number of trips generated by the project. Providing trip generation for each land use will help properly identify where the trips are coming from. The peak hour trips that will be generated in this project will go beyond the 100-peak trip threshold. Contribution to mitigations should be made to provide improvements to SR-65, to new or current interchanges connected to SR-65, and ramp meters for SR-65.

According to Table 13, the percentage of external trips that will be made due to the PRSP development plus existing conditions is 75% (161,941 trips) while internal trips are 25% (54,458 trips). The 161,941 external trips are about 170% of the provided existing ADT of SR-65 (about 91,600 ADT). The "Change in Average Daily Traffic for Existing and Existing Plus Placer Ranch Conditions" figure shows that the ADT along some segments of SR-65 increased by a maximum of 6,000 vehicles while some segments decreased by 6,000 vehicles. This example does not properly convey the effects of the external trips to SR-65. Please provide an explanation for this inconsistency. Although a "Change in Average Daily Traffic" figure can be analogous to a Trip Distribution figure, a Trip Distribution figure should be provided to properly show trends from generated trips from the proposed project.

1-1
cont.

Traffic Operations

The proposed project currently has existing bicycle/pedestrian and bus facilities serving the nearby Sunset Boulevard vicinity which will be connected to future multi-modal facilities. It is recommended that this project also provide connection to the Whitney Ranch Parkway area to complete a future system which would connect to existing bicycle/pedestrian and bus facilities.

1-2

Currently, SR 65 is operating at Level of Service (LOS) F. It is anticipated that this project would generate thousands of additional peak hour trips and introduce significant amount of delays on SR 65. The need to identify traffic operational impacts and mitigations that this proposed development will bring is a critical component to the continued operation of the existing state facilities. It is recommended that the proposed development provide contribution on mitigation to the following:

- Improvement of Industrial Boulevard, which is a local roadway, that is parallel to SR 65 and serves as a one of the arterial connections to SR 65.
- Connect Whitney Ranch Parkway eastbound from Industrial Boulevard the SR 65 interchange.
- Upgrade the Whitney Ranch Parkway interchange (similar to Sunset Boulevard IC) to add southbound on/off ramps and a northbound entrance access/ramp from eastbound Whitney Ranch Parkway widen the existing ramps. Also add ramp metering to all HOV lane entrance ramps.

1-3

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Ms. Shirlee Herrington, Placer County Community Development Resource Agency
February 22, 2019
Page 3

- Addition of ramp metering to the HOV lanes on the Sunset Boulevard interchange.
- Addition of auxiliary lanes in both direction of SR 65 between Whitney Ranch Parkway and Sunset Boulevard interchanges.
- Mainline HOV lane on both directions of SR 65.

1-3
cont.

Hydraulics

The development of Sunset Area Plan and Placer Ranch Specific Plan will increase impervious surface area through the construction of a mixed-use town center, commercial and office uses, a university site, and a diverse housing mix, etc. with a corresponding increase in surface water runoff. The foreseeable development projects would develop over 50,000 acres in the region, adding more than 100,000 residential units and millions of square feet of non-residential building floor area. This project will decrease surface water detention, retention and infiltration.

No net increase to 100-year storm event peak discharge may be realized within the State's highway (SR 65) right of way and/or Caltrans drainage facilities because of the project. Any cumulative impacts to Caltrans drainage facilities arising from effects of development on surface water runoff discharge from the 100-year storm event should be minimized through project drainage mitigation measures.

Increases in peak runoff discharge for the 100-year storm event to the State's highway (SR 65) right of way and to Caltrans' highway drainage facilities must be reduced to at or below the pre-construction levels. The cumulative effects on drainage due to development within the region should be considered in the overall development plan of this area.

1-4

All grading and/or drainage improvements must maintain or improve existing drainage pathways and may not result in adverse hydrologic or hydraulic conditions within the State's highway (SR 65) right of way or to Caltrans drainage facilities. The developer must maintain or improve existing drainage patterns and/or facilities affected by the proposed project to the satisfaction of the State and Caltrans. This may be accomplished through the implementation of storm water management Best Management Practices (i.e., detention/ retention ponds or basins, sub-surface galleries, on-site storage and/or infiltration ditches, etc.). Once installed, the property owner must properly maintain these systems. The proponent/developer may be held liable for future damages due to impacts for which adequate mitigation was not undertaken or sustained.

Runoff from the proposed project that will enter the State's highway (SR 65) right of way and/or Caltrans drainage facilities must meet all regional water quality control board water quality standards prior to entering the State's highway (SR 65) right of way or Caltrans drainage facilities. Appropriate storm water quality Best Management Practices may be applied to ensure that runoff from the site meets these standards (i.e., is free of oils, greases, metals, sands, sediment, etc.). Once installed, the property owner must

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Ms. Shirlee Herrington, Placer County Community Development Resource Agency
February 22, 2019
Page 4

properly maintain these systems in perpetuity.

All work proposed and performed within the State's highway (SR 65) right of way must be in accordance with Caltrans' standards and require a Caltrans Encroachment Permit prior to commencing construction.

Based on Title 23, the Pleasant Grove Creek and Auburn Ravine which are located within the SAP site are listed as Regulated Streams of Central Valley Flood Protection Board (Board) of DWR. If this project is implemented within the boundary of Pleasant Grove Creek and Auburn Ravine, the encroachment permit shall be obtained from the Board.

Please provide our office with copies of any further actions regarding this project or future development of the property. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any question regarding these comments or require additional information, please contact David Smith, Intergovernmental Review Coordinator for Placer County, by phone (530) 634-7799 or via email to david.j.smith@dot.ca.gov.

Sincerely,



KEVIN YOUNT, Branch Chief
Office of Transportation Planning
Regional Planning Branch—East

1-4
cont.
1-5

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Letter 1	California Department of Transportation Kevin Yount, Branch Chief, Office of Transportation Planning Regional Planning Branch—East February 22, 2019
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1-1 The comment requests a project-only trip generation table to identify the number of trips generated by the project. The comment raises issues with Draft EIR Exhibit 4.14-11, stating that the changes in average daily traffic (ADT) shown do not convey the effects of project trips on State Route 65 (SR 65). The comment also requests a trip distribution figure to show the travel patterns from trips generated by the project. Table 4.14-19 in the Draft EIR presents the project trip generation for the PRSP. As described on page 4.14-43 of the Draft EIR, Exhibit 4.14-11 reflects the project's effect on sub-regional travel patterns. This means the analysis accounts for a redistribution of existing trips that would occur with the proposed project. For example, nearby residents that currently travel to businesses and services further away may instead travel to businesses and services that are located in the PRSP area. As a result, some existing trips on SR 65 travel to destinations in the proposed project, resulting in a decrease in trips on some segments as existing traffic diverts off SR 65. Furthermore, the addition of project trips is partially offset by this redistribution of existing trips resulting in a lower net increase. As shown in this figure, the greatest change in traffic occurs on roadways that directly serve the PRSP area, which is expected with the addition of project uses. Intuitively, the project's effect on traffic dissipates further from the project.

In response to the comment, a trip distribution exhibit has been prepared (Exhibit 3-5).

1-2 The comment requests the project provide bicycle/pedestrian and bus facilities connecting to the Whitney Ranch Parkway area (i.e., on Placer Parkway). As described on pages 4.14-36 and 4.14-50 of the Draft EIR, Placer Parkway would provide transportation connections between the project and the Whitney Ranch Parkway area, and would serve vehicular modes, including transit. However, bicycle and pedestrian facilities are not consistent with the function and design of expressways, like Placer Parkway which has been discussed and agreed to by Caltrans during the Project Approval and Environmental Document (PA&ED) for Phase I of Placer Parkway. The County anticipates having 90 percent design plans this fall and is not including pedestrian facilities in the design consistent with prior approvals. Bicycle and pedestrian facilities that are consistent with County functional classification and design standards are provided on parallel roadways, such as Athens Avenue and Sunset Boulevard.

1-3 The comment describes the project's effect on SR 65 and suggests that the project contribute to a list of specific improvements along the SR 65 corridor. The project's impact to traffic operations on SR 65 is disclosed as Impacts 4.14-10 and 4.14-23 in the Draft EIR. Mitigation Measure 4.14-10 describes the project's contribution to improvements of SR 65, including potential auxiliary lanes and a mainline high occupancy vehicle (HOV) lane as identified in the comment. The improvements to the Whitney Ranch Parkway interchange identified in the comment are part of the Placer Parkway Phase I project, which is discussed on page 4.14-49 in the Draft EIR. The Sunset Boulevard interchange already has ramp meters installed.

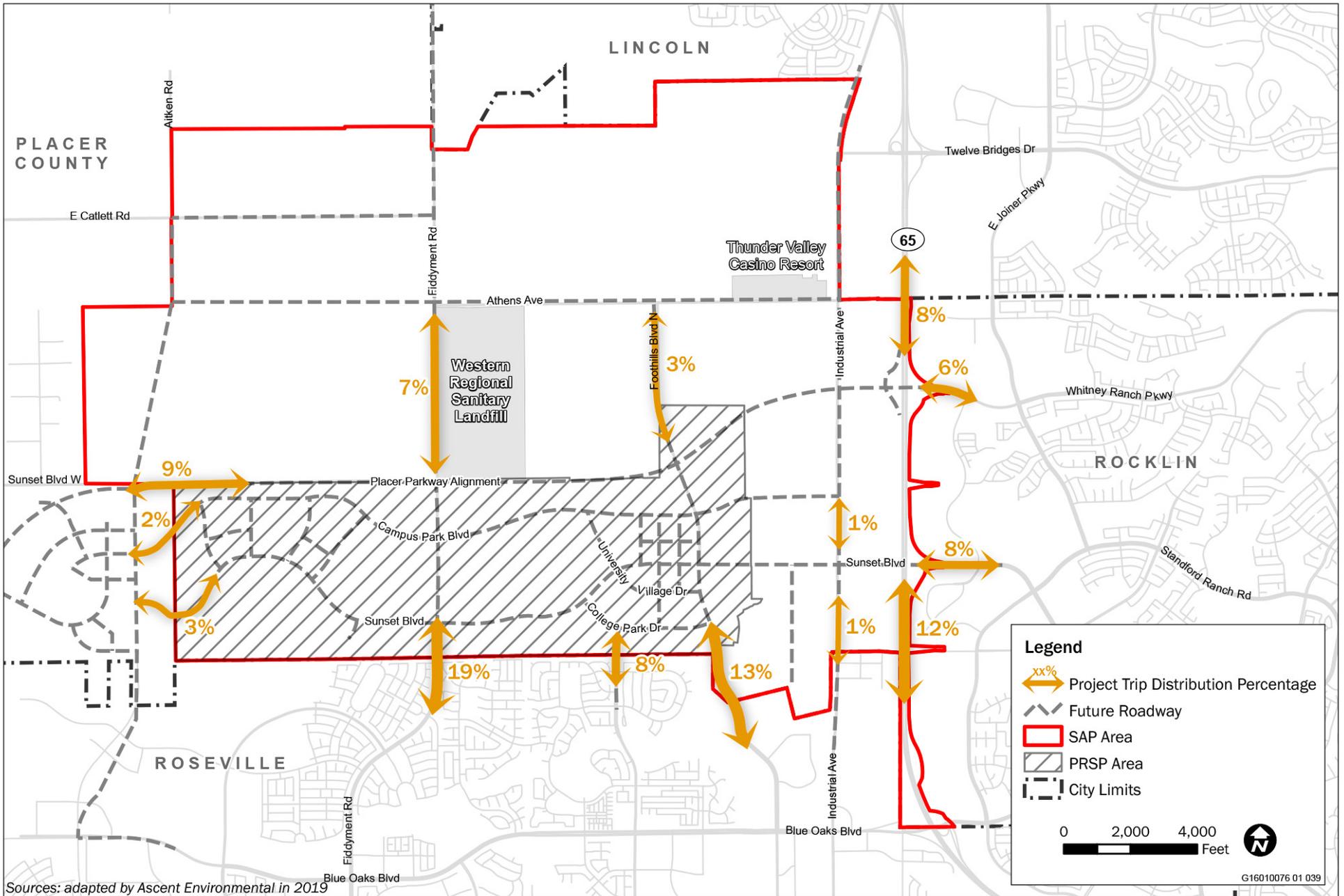


Exhibit 3-5

PRSP Area External Project Trip Distribution



To clarify what improvements could be funded by an existing or new regional fee program, Mitigation Measure 4.14-10 on page 4.14-86 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-10: Contribute fair share of feasible physical improvements to freeway operations (Net SAP Area and PRSP Area)

Prior to building permit issuance, project proponents of individual development projects within the SAP area shall be responsible for the project's fair share of all feasible physical improvements necessary and available to reduce the severity of the project's significant traffic impacts to freeway operations as identified in this traffic analysis consistent with the policies and exceptions set forth in the Transportation and Circulation Element of the Placer County General Plan. This may include any, or some combination of, the following forms:

- ▲ Payment of impact fees to the South Placer Regional Transportation Authority (SPRTA) in amounts that constitute the SAP area's fair share contribution to the construction of transportation facilities funded through fees collected by the SPRTA for Tier 1 and/or Tier 2 projects. This includes the following transportation projects that would directly improve operations on SR 65 and I-80:
 - SR 65 Widening, including auxiliary lanes and a mainline mixed-flow or HOV travel lane
 - I-80/SR 65 Interchange, and
 - I-80/Rocklin Road Interchange
- ▲ Payment of other adopted and applicable regional impact fees that would provide improvements to freeway facilities that are affected by multiple jurisdictions, such as the Highway 65 JPA Fee, which provides funding for interchange improvements along SR 65.
- ▲ Placer County shall coordinate with their regional partners to modify an existing or adopt a new regional fee program to include the improvements identified that will constitute the regions fair share toward the identified improvements. These improvements may include:
 - Add ramp metering to high occupancy vehicle (HOV) lane entrance ramps on SR 65
 - Add auxiliary lanes to SR 65

- 1-4 The comment raises issues related to altering drainage patterns and increasing stormwater runoff, such that flooding or other adverse hydrologic effects could occur within the SR 65 right-of-way. The Draft EIR states (page 4.9-31) that protective SAP policies and Placer County permit conditions would require any future development within the project area to implement low impact development (LID) for the 2-year storm event and implement stormwater management measures to reduce stormwater peak flows to below predevelopment levels. Furthermore, the Draft EIR includes Mitigation Measure 4.9-1b, which requires specific details regarding how individual projects would achieve reduction of stormwater flows to obtain an objective post-project mitigated peak flow that is equal to the estimated pre-project peak flow, less 10 percent of the difference, through the installation of detention facilities. Mitigation Measure 4.9-1b also requires mitigation of volumetric increases in stormwater in accordance with Placer County Storm Water Management Manual and/or City of Roseville standards. For these reasons, implementation of the proposed SAP/PRSP would not result in flooding or other adverse hydrologic affects related to Caltrans facilities. No further response is required.

To provide clarification, Mitigation Measure 4.9-1b on page 4.9-32 of the Draft EIR is revised as follows:

Mitigation Measure 4.9-1b: Design, construct, and maintain regional stormwater retention and detention facilities or pay retention mitigation fees (Net SAP Area and PRSP Areas)

The improvement plan submittal and final drainage report shall ~~provide details on how to achieve the following requirements: demonstrate, through the preparation of technical engineering studies, that the increased peak flow and volume of stormwater runoff from the proposed development can be accommodated on-site or in the approved City of Roseville Regional Stormwater Retention Facility and/or other off-site facility. The study shall:~~

1. Be submitted to the City of Roseville Public Works Department for review and concurrence in the Net SAP or PRSP is proposing to utilize the City of Roseville Regional Stormwater Retention facility for stormwater retention;
2. Demonstrate, through the preparation of technical engineering studies, that sStormwater run-off peak flows shall be reduced to obtain an objective post-project mitigated peak flow that is equal to the estimated pre-project peak flow, less 10 percent of the difference, through the installation of detention facilities; and,
23. Demonstrate, through the preparation of technical engineering studies, that sStormwater volumetric increases are mitigated to retain the increase for the 100-year, 8-day design storm, depth of 10.75 inches at elevation of 200- feet, unless another methodology has been agreed upon by Placer County. The project proponent shall either provide permanent on-site retention or participate in a regional stormwater retention program, if established by the County, by paying retention mitigation fees including maintenance and operation costs, as deemed appropriate, to mitigate the project's increases to stormwater volume. If interim retention facilities are constructed within the PRSP and net SAP areas on parcels zoned for development, the development project would also be subject to payment of the retention fee, in order to fund construction of the ultimate regional retention facility.

Retention and detention facilities shall be designed in accordance with the requirements of the Placer County Storm Water Management Manual ~~and/or City of Roseville~~ standards that are in effect at the time of submittal, and to the satisfaction of the Engineering and Surveying Division, and shall be shown in the improvement plans. No retention/detention facility construction shall be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals.

- 1-5 The comment notes the required encroachment permits necessary prior to commencing construction within the State right-of-way and/or within the boundary of Pleasant Grove Creek and Auburn Ravine. The appropriate encroachment permits would be obtained in accordance with Caltrans' standards and/or the Central Valley Flood Protection Board prior to commencing construction.



Letter 2

February 20, 2019

Crystal Jacobsen
 Placer County Community Development Resource Agency
 Environmental Coordination Services
 3091 County Center Drive, Suite 190
 Auburn, CA 95603

Re: Comment Letter Sunset Area Plan/Placer Ranch Specific Plan SCH No. 2016112012

Dear Ms. Jacobsen:

Please accept the City of Lincoln’s comments on the DEIR for the Sunset Area/Placer Ranch project. The City’s concerns with the project and the environmental analysis rest primarily with the potential cost to solid waste ratepayers due to residential encroachment within the current 1-mile landfill buffer. The City is also concerned about service impacts on the City of Lincoln by creating a new, urbanized, unincorporated area in South Placer.

Landfill Encroachment - With regard to the Placer Ranch component of the project, the City of Lincoln is supportive of a Sacramento State University satellite campus. We recognize that incentives and concessions may be necessary to secure this important regional asset. However, the landfill is another important regional asset that must be protected. This ratepayer asset is shared throughout the county. We are concerned about reduction in the landfill setback, the lack of quantified analysis, and the lack of appropriate mitigations identified in the EIR. We are concerned that the countywide ratepayers will be subject to unanticipated costs to fight litigation, as well as fund future design and construction of odor elimination improvements that have not been fully identified or discussed in the EIR.

The only analysis in the EIR is a comparison of other landfills, their setbacks, a complaint analysis based on existing development, and suggestion of mitigations used by other landfills, such as misters that might be required based on future complaints. There is no quantified analysis that supports reducing the setback over 80% from 5,280 feet for residential development to as close to 1,000 feet in some instances.

The EIR should identify all improvements that can reduce odor such as enclosing the composting operation and providing an air filtration system, and include engineer cost estimates to implement all identified improvements. The delta between the current landfill CIP and expansion budgets and the cost to implement various unanticipated odor control improvements should be identified. The County should then set up a mechanism to fund those improvements from those who are benefiting from the encroachment. The mitigation does discuss disclosures, but the County should also consider more restrictive legal instruments similar to aviation easements for airports.

Fiscal Impact Analysis and Revenue Sharing - On October 16, 2016 the Cities of Lincoln, Rocklin and Roseville collectively requested that when the County considered processing a General Plan Amendment for the Sunset/Placer Ranch area that there be agreed upon approach to addressing the fiscal impacts to the surrounding incorporated areas. This approach included an

2-1

2-2

Lincoln Community Development Department
 600 Sixth Street, Lincoln, CA 95648
 (916) 434-2400

City of Lincoln Comment Letter Sunset Area Plan/Placer Ranch Specific Plan
February 20, 2019

Page 2 of 2

agreement between the County and with the adjoining Cities that would specify acceptable levels of service (police, fire, parks, libraries, transit, utilities, etc.) and measures that would mitigate the impacts to the surrounding municipalities. These "level of service" impacts on surrounding cities were to be evaluated in the EIR and discussed in a fiscal impact analysis. Costs and revenues to both the Cities and the County, resulting from the modifications to the County's land use plan were to be considered in such an analysis. We look forward to reviewing the findings of this analysis but believe it should be considered in the service level impacts in the EIR and the fiscal impact analysis should be a supporting document similar to other technical studies.

2-2
cont.

Thank you for your consideration of these comments. The City looks forward to working with the County to secure a university and protect the existing and future landfill expansion area.

Sincerely,



Matthew J. Wheeler, P.E.
Community Development Director

Cc: Jennifer Hanson, Lincoln Interim City Manager
Steve Pedretti, Placer County CDRA Director

~ Lincoln, A City of Opportunity ~

Letter 2	City of Lincoln Matthew J. Wheeler, P.E., Community Development Director February 20, 2019
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- 2-1 The comment raises issues with placing sensitive land uses in proximity to the landfill. See Master Response 4: Odors, which addresses these issues.
- 2-2 The comment requests a fiscal impact analysis be performed. Service level impacts are evaluated in Section 4.13, "Public Services," of the Draft EIR. Although not a requirement under CEQA, the County has prepared a fiscal impact analysis and financing plan for the PRSP pursuant to its General Plan Policy 4.B.6. The Financing Plan, which includes a summary of service impacts, is included with the package that goes to the Board of Supervisors for their consideration.



<p>Letter 3</p>

February 22, 2019

Ms. Leigh Chavez
 Placer County Environmental Coordinator
 3091 County Center Drive, Ste. 190
 Auburn, CA 95603

Dear Ms. Chavez:

Thank you for the opportunity to review the Draft EIR (DEIR) for the Sunset Area Plan (SAP) /Placer Ranch Specific Plan (PRSP) project. The project location is as follows: The SAP, which includes the PRSP project, encompasses 8,497 acres located in unincorporated south Placer County. The Plan area covers 13.9 square miles between the cities of Rocklin to the east, Roseville to the south, Lincoln to the north and unincorporated Placer County to the west. The Plan area is located immediately west of State Route 65 which connects to I-80 in the south and State Route 99 to the north.

The project proposes to update the 1997 Sunset Industrial Area Plan with a higher density mix of labor- and employment-intensive uses with an emphasis on innovation and creativity. Nested within the SAP, the proposed PSRP includes a mixed-use town center, commercial and office uses, a university site and a diverse housing mix. The project’s proposed land uses are as follows: Residential Uses - 801.4 acres consisting of 5,636 dwelling units; Commercial and Employment Uses – 707.7 acres consisting of 8,440,513 square feet; Open Space and Public Uses – 377.5 acres.

The City has completed its review of the DEIR and offers comments as they relate to the overall project and as they to the environmental analysis:

A. Project Description

1. The discussion of Land Use Buffer Zone Standards notes that the principal concern is to balance the needs of employment-supporting uses, a public university, and residential uses with the operational needs of the Western Regional Sanitary Landfill (WRSL) and that revisions to the Placer County General Plan buffer zone standards are proposed. It is our belief and concern, as elaborated upon further in this letter, that the revised buffer zone standards will not adequately protect the landfill.

3-1

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B. Air Quality

1. The discussion of Sensitive Land Uses acknowledges that residential dwellings are considered to be sensitive receptors and then notes that the closest sensitive receptors to the project site is a residential development in the City of Roseville adjacent to the southern project area boundary. The discussion should also acknowledge that the project itself has the potential to introduce new residential development and other sensitive land uses in close proximity to WRSL due to the project's proposal to reduce existing landfill buffer distances.
2. Analysis of Project Impacts to the Western Regional Sanitary Landfill (WRSL) and Proposed Buffer Reduction

Landfill Buffer Reduction

It would seem there is an inherent conflict which is unfair to all jurisdictions within Placer County that the same entity which has authority over the decision to reduce buffers applied to the Landfill is also in this case the applicant for the Project. The Landfill is a finite resource (likely not replaceable in Placer County) whose viable operation and protection is essential to all agencies and residents.

Landfill / Odor Analysis

The DEIR's analysis concerning a proposed housing development project near the Western Regional Sanitary Landfill (WRSL) is inadequate as a matter of law, specifically with regards to odors near the landfill and the lack of adequate mitigation measures to guard against exacerbation of such impacts.

Although generally CEQA does not require an analysis of existing conditions and its relationship to a project, the exception is when a project risks exacerbating already existing conditions at a project site. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 [hereinafter "CBIA"].) While the County "opts to evaluate and draw significance conclusions" in the DEIR, finding the impact "significant" and that "the project would expose a substantial number of people to objectionable odors," the DEIR still fails to address this exacerbation as a result of the new development. The Project will account for nearly 1/6 of the amount of solid waste that will be handled at the WRSL when compared to current conditions. Long-term build-out conditions would still account for nearly 10% of the total solid waste handled at the WRSL.

In a study published on November 9, 2017, the same consultant for the County concluded that "newly placed waste" is a "contributor to odors." (Ascent Environmental, Review of Odor Management at Western Regional Sanitary Landfill, § 2.1.1, available at https://www.placer.ca.gov/~media/cdr/planning/sunsetindareaplanupdate_wrs%20odor%20evaluation%202017%20v1-5,-d,-final.pdf?la=en [hereinafter "Review of Odor Management"].) In that study, the County's consultant concluded that "development between the landfill and areas that are already being impacted by odor is likely to result in additional odor issues unless WRSL significantly reduces existing odor emissions." (*Id.* at § 8.0.) Furthermore, the DEIR readily acknowledges that the Project will directly result in an increase in "exceedances of specific odor

3-1
cont.

levels.” (DEIR at p. 4.3-50.) Rather than reduce sources of odor, the County is now seeking to exacerbate those impacts by (1) substantially increasing the amount of odor-causing solid waste handled at WRSL; and (2) exposing the Project’s future users to worse conditions than they would otherwise experience.

The fact that the County at one point prohibited development from occurring in proximity to the WRSL, demonstrates at least an awareness of the odor impacts at issue and other sections of the DEIR are again, in direct contrast with section 4.3. In fact, Impact 4.10-2 in Section 4.10 of the DEIR states "Complaints directed at WRSL have been received from residents **more than 2 miles away**, primarily about odors, with complaints also received about dust, litter, and traffic..." (Emphasis added). The DEIR further admits that “residential encroachment could create pressures on the WRSL operations, resulting in the need to entertain other solutions: diverting waste to another facility, which could be costly and result in environmental impacts, or siting a new facility, which would likely be infeasible given cost, timing and regulatory considerations. (DEIR at p. 4.10-15.) Again, rather than analyze the environmental impacts of those probable results, the DEIR is wholly silent, and consequently, legally inadequate.

Even if the County is correct that the DEIR is “not strictly required to [analyze odor impacts],” the siting and development of a project of this size will most certainly exacerbate odor impacts due to the reduction in the size of the landfill buffer and the placement of sensitive receptors in a closer proximity than currently allowed. The DEIR acknowledges this by stating "...it is expected new residents and users within the project area would be exposed to objectionable odors, would complain about such odors from the WRSL operations, and that the overall number of complaints lodged about nuisance odors would increase." (DEIR at p. 4.3-48.)

3-1
cont.

This is particularly disturbing because the County is acutely aware of the unmitigated, significant, environmental impacts of this project if it is approved as proposed. The County adopted General Plan Policy 4.G.11 precisely to **protect** the landfill from incompatible encroachment. That policy states, in pertinent part, "new residential land uses [shall] be separated from the property lines of active and future landfill sites by a buffer of one mile." Despite this policy and one mile buffer, odor impacts exist from outwards of two miles. To now propose reducing that buffer and allow residences to be as close as 1,000 feet is incompatible with the County's existing General Plan, exacerbating already existing conditions at the project site.

The DEIR also notes that Placer County considered the merits of a regional mitigation fee program but determined such to be infeasible. Then, the DEIR asserts that mitigation measures to guard against the risk that the odors at the WRSL site are exacerbated by a reduction in the landfill buffer and introduction of residential uses would be beyond the control of Placer County, yet feasible mitigation measures are available to the WPWMA which owns and operates the WRSL. To place the burden on the WRSL to implement potential mitigation measures is inadequate and improperly imputes the onus of mitigation on the WRSL and its current rate payers rather than the project proponent—the County. When the DEIR does propose measures to offset odor which can be implemented by the County, these measures are limited to specific plan modifications, such as building design and landscape design, and written disclosures to prospective buyers. Disclosures to prospective purchasers may or may not place them on notice of odor issues, but none of these actually mitigate impacts of odor. The

"measures" contained in the DEIR fail to address the actual exacerbation of the odors and do not offer alternatives to the Project that would reduce or lessen odor impacts.

The County originally did not plan to develop near the WRSL site and so adopted General Plan Policy 4.G.11. Now that it has decided to do so, it must engage in a thorough analysis of the existing conditions and propose proper mitigation measures to ensure that currently existing odors are not exacerbated, causing the very harms that CEQA was enacted to prevent. These measures should conform with General Plan Policy 4.G.11 and Land Use Policy/ED-10.3: Development Separators. The City is willing to engage in discussions with the County to facilitate an agreement whereby the County mitigates the exacerbation of impacts from the proposed project.

3-1
cont.

For all of these reasons, the Project must adopt additional mitigation measures to address this identified significant impact and not leave the burden of mitigating this significant impact to existing ratepayers.

C. Transportation/Circulation

1. Policy TM-1.9: Additional Traffic Impact Mitigation – It is referenced within this policy that additional traffic impact mitigation could include contribution to funding of transportation system improvements (e.g., traffic fees, VMT fees) and/or dedication of right-of-way for future improvements. It is suggested that this policy also incorporate the concept of payment or construction of off-site mitigations where impacts occur in outside jurisdictions.

3-2

2. The use of a “mall” trip generation rate (26 trips/1000 sf) for the non-residential portion of the Entertainment Mixed Use zone appears to underestimate the actual number of trips that could occur as a result of some potential uses in that zone attracting large crowd volumes.

3-3

3. Figure 4.14-11 – the segment of Whitney Ranch Parkway between SR65 and Wildcat Boulevard is represented as having no change between Existing and Existing Plus Placer Ranch conditions, yet the segment of Whitney Ranch Parkway east of Wildcat Boulevard is projected to have increased volumes despite both roads feeding into it having an increase in volumes. These results should be verified as they appear to be counter-intuitive.

3-4

4. Page 4.14-94 – Land Use Inputs – it is not clear why the buildout of Roseville and County Specific Plans are assumed but not buildout in Rocklin and only residential absorption (i.e., no non-residential) in Lincoln?

3-5

5. Mitigation Measure 4.14-5, Pay impact fees associated with signalized intersections in City of Rocklin to Placer County –

- Some of the mitigation measures include a component of prohibiting U-turn movements. Because such an option may not be acceptable to the City of Rocklin, we request that other mitigation options be explored that would return the level of service in those locations to an acceptable level.
- The proposed mitigation approach of first requiring development projects within the SAP and PRSP areas to pay fair share impacts fees to Placer County and then Placer County to negotiate with the City of Rocklin to enter into arrangements with Rocklin for

3-6

the provision of adequate fair share funding from the project for significant impacts on City of Rocklin intersections is not the City’s preferred approach and does not appear to be in the County’s best interests in ensuring that the development project is financially responsible for all of its fair share impact fees. It is preferred that the determination of fair share fees between the City of Rocklin and Placer County should occur first, and then the development projects should pay the as-determined fair share amount.

- The City of Rocklin has no current interest in participating in additional sub-regional or regional approaches to mitigate transportation-related impacts beyond what we currently participate in given our near build-out status. The City evaluates transportation-related impacts from Rocklin development to facilities outside of Rocklin through the CEQA process, and if significant impacts to such facilities are identified, mitigation measures are also identified.
- *Adherence to City of Rocklin General Plan Policy C-10*
The City of Rocklin’s Level of Service Policy is presented in the DEIR, however, it should be noted that under Policy C-10(C) impacts created by development in another jurisdiction are to restore the LOS in Rocklin back to “C” unless it is determined by the Rocklin City Council and not another entity that the mitigation is infeasible. In cases where impacts are created by development in an adjacent jurisdiction, mitigation is to be implemented to the fullest extent practicable as determined by the City Council.

3-6
cont.

C-10 A. Maintain a minimum traffic Level of Service “C” for all signalized intersections during the p.m. peak hour on an average weekday, except in the circumstances described in C-10.B and C. below.

B. Recognizing that some signalized intersections within the City serve and are impacted by development located in adjacent jurisdictions, and that these impacts are outside the control of the City, a development project which is determined to result in a Level of Service worse than “C” may be approved, if the approving body finds (1) the diminished level of service is an interim situation which will be alleviated by the implementation of planned improvements or (2) based on the specific circumstances described in Section C. below, there are no feasible street improvements that will improve the Level of Service to “C” or better as set forward in the Action Plan for the Circulation Element.

3-7

C. All development in another jurisdiction outside of Rocklin’s control which creates traffic impacts in Rocklin should be required to construct all mitigation necessary in order to maintain a LOS C in Rocklin unless the mitigation is determined to be infeasible by the Rocklin City Council. The standard for determining the feasibility of the mitigation would be whether or not the improvements create unusual economic, legal, social, technological, physical or other similar burdens and considerations.

3-8

- *Global Comment – Traffic Mitigation Measures/Secondary Impacts*
CEQA requires identification of the impacts created by proposed mitigation measures. In areas where widening, lane additions or other reconfigurations are suggested to

3-9

mitigate traffic impacts, graphics should be provided that are superimposed over aerials to clearly show the extent of the physical impacts (i.e., to landscaping, driveways, utilities, parking as well as modifications to other portions of the intersection that would be necessary to create receiving lanes, etc.) that would result from the proposed improvements so that the public, affected agencies, and decision makers can be fully informed regarding these secondary effects and fairly evaluate their true feasibility.

3-9
cont.

- *Pacific Street / Sunset Boulevard*

The proposed mitigation measure is unclear and potentially incomplete with regard to the improvements that are identified. There is currently an eastbound left turn lane and left turn/through lane on Sunset to Pacific. If the measure is suggesting that two left turn only lanes are needed, then the roadway would require considerable widening to replace the current through capacity being eliminated. Depending upon how far back the two left turn lanes need for queuing, it could also require widening of the Sunset Boulevard overcrossing of the railroad and may create the need for additional widening for receiving lanes on the other side of the intersection. Also see prior general comment regarding the need for graphic depictions and analysis of the secondary effects of proposed mitigation measures.

3-10

6. Impact 4.14-10 Impacts to freeway operations - Most of the impacts on State Route 65 and I-80 are adjacent to Rocklin and Roseville. The traffic analysis assumes all currently planned and programmed improvements to Highway 65 and I-80 are constructed and yet in the cumulative scenario many mainline segments of those facilities are still projected to function at extremely low Levels of Service, in fact LOS F in many locations. The payment of regional fees approach does not work in that scenario and the DEIR does not appear to identify any mitigation for PRSP and SAP project specific impacts to state facilities. The study asserts that a certain percent of traffic that would otherwise use state facilities will deviate to local streets in Rocklin and Roseville and that those volumes have been accounted for. However, given the extremely poor projected LOS on SR 65 in particular, we are concerned that the percentage of trips that will actually divert to local streets will actually be much higher. The assumptions for such deviations should be revisited.

3-11

The scale of the project seems to be well beyond what existing or planned improvements to state facilities can accommodate. Perhaps the densities and intensities of proposed land uses in the SAP / PRSP areas should be scaled back to better coincide with the capacities of the infrastructure that will be available. This is completely within the County's control, therefore, findings that impacts to various traffic facilities are significant and unavoidable is not accurate. As an example, the City of Rocklin adopted "Trip Caps" as part of the North West Rocklin General Development Plan to ensure that future development within the Highway 65 Corridor would not exceed established LOS standards. Such an approach or a reduced intensity land plan should be seriously considered.

7. Mitigation Measure 4.14-18b, Pay fair share cost toward modifying Pacific Street/Sunset Boulevard intersection (Net Sap Area and PRSP Area) – similar to the concern noted above regarding mitigation for this same intersection, the proposed mitigation measure is unclear and potentially incomplete with regard to the improvements that are identified. There is currently an eastbound left turn lane and left turn/through lane on Sunset to Pacific. If the measure is

3-12

suggesting that two left turn only lanes and a shared through-left turn lane are needed, then the roadway would require considerable widening to replace the current through capacity being eliminated. Depending upon how far back the two left turn lanes and shared through/left turn lane need for queuing, it could also require widening of the Sunset Boulevard overcrossing of the railroad and may create the need for additional widening for receiving lanes on the other side of the intersection. Also see prior general comment regarding the need for graphic depictions and analysis of the secondary effects of proposed mitigation measures.

3-12
cont.

8. Traffic Associated With Entertainment Venues and Theme Parks

One other note of concern is related to the Entertainment Mixed-use Zoning District. Exhibit 3-6 notes further “sub-zones” of EMU-AD, EMU-CD and EMU-SD, but does not provide any standards that differentiate these sub-zones. Of primary concern would be the uses that would likely fall under the EMU-AD (Attraction District). As noted, EMU uses include entertainment venues and theme parks. These uses, depending on their specific nature, can be huge traffic generators for very specific time periods (i.e., concert start and end times) and could severely impact Highway 65 and Sunset, specifically. It is also unclear how and if these types of uses have been accounted for in the traffic analysis. Although not necessarily feasible to size these roadways for “concert-level” traffic, a policy that requires site design of large-scale entertainment facilities to remove traffic off local roadways as quickly and efficiently as possible as well as disperse traffic back onto roadways in a controlled manner should be considered.

3-13

In addition, it was noted for traffic analysis purposes that the trip generation rate used for the non-residential portion of the EMU District was “Mall” at 26 trips per one thousand square feet. Based upon the description of the EMU District and the potential land uses anticipated to be located there, the concern is that a “Mall” trip generation rate significantly underestimates the potential trip generation rate of the type of regionally attracting use that could be located in the EMU District and a higher trip generation rate should be used for conservative purposes.

9. There is concern with Policy TM-1.9 in that it allows all projects in the PRSP/SAP area to not undergo additional traffic analysis if the development projects are deemed to be consistent with the land use assumptions of the EIR. Given that the it is acknowledged in the EIR that buildout of the SAP would occur over 80+ years and the Cumulative Plus PRSP Plus SAP (20-Year Project) scenario only includes a 20 year buildout horizon based on a market analysis, there is a 60+ year gap in the cumulative year traffic analysis. To truly capture the incremental traffic impacts for projects that are developed beyond what was assumed in the 20- year development horizon, it is suggested that Policy TM-1.9 be adjusted to acknowledge that if future land development beyond what was assumed in the 20 year development horizon is proposed, those development projects will require additional traffic analysis and mitigation of impacts identified in the analysis.

3-14

D. Public Safety

Fire

It is difficult to quantify the project’s impacts to Rocklin Fire and the City’s Emergency Response System. The document discusses that the need for fire protection and emergency response

3-15

services will increase, including an increase in the demand for additional firefighters, but it does not discuss how they will be deployed. It is noted that new development would be annexed into an existing CFD or a new CFD, but ideally the development of all ultimately needed fire station facilities would be front loaded and staffing increases tied to specific development milestones so that adjacent communities will not have to absorb the need to provide services since the current plan is a pay/build as you go model. One concern that does not appear to have been addressed is the impact of additional traffic on major arterials and State Route 65 including how that affects Rocklin Fire’s response model. As congestion increases it has a direct impact on Fire and medical emergency service response times.

3-15
cont.

Law Enforcement

Unlike a fire department model, law enforcement assigns officers to an onsite specific geographical location for service through beats, as opposed to responding from a particular station. However, lacking a substation in the vicinity, calls for back-up could be requested from other Sheriff Department personnel or adjacent jurisdictions. Ideally a Sheriff’s substation would be planned within the SAP/PRSP area at this time and the County would front load investment in that infrastructure so that adjacent communities will not have to absorb the need to provide services since the current plan is a pay/build as you go model. County service levels are difficult to predict, but we do not anticipate the proposed development would have an over extending need for additional law enforcement assistance from the Rocklin Police Department, beyond routine. However, mitigation language should acknowledge that if future service requests were deemed beyond routine, the Police Chief would need to meet with the Sheriff and discuss providing assistance, above routine, moving forward. Requests for outside law enforcement assistance, above routine are currently covered under the California Master Mutual Aid Plan which operates out of both the County and the State Office of Emergency Services.

3-16

Prospective issues with this development that could potentially effect law enforcement within the City of Rocklin stem from the traffic generated by the development and the traffic associated with a 4 year University. With the current layout of State Route 65, traffic congestion is already well beyond the norm. Adding the possibility of tens of thousands of new vehicle trips a day could theoretically force vehicles off of State Route 65 onto surface streets in to the surrounding cities including Rocklin. More vehicle trips on City streets brings the possibility of more accidents and/or demands for other law enforcement related traffic enforcement. In addition, this extra traffic could impact our response times and road quality causing our roads to fail faster than originally anticipated. These issues do not appear to have been currently addressed in the DEIR.

E. Drainage

It is our understanding that Rocklin drainage has been factored in the estimation of regional off-site drainage capacities and if so, is development of the SAP / PRSP diminishing the capacity of regional facilities and causing the need for increased capacity improvements beyond those already planned? If so the SAP / PRSP development should be responsible for funding both the Planning and implementation of expanded improvements beyond those that are already planned.

3-17

F. Alternatives

The Alternatives analyzed in the DEIR are not adequate and should include a scenario with a land plan that implements the current 1 mile buffer from the landfill for sensitive uses including all new residential as well as the University Campus.

3-18

G. Off Setting Development Impacts

Text regarding "Consultation with Neighboring Cities" on page 4.15-33 currently discusses the following Draft Policy PF-2.9 in the SAP: "The County shall consult with the Cities of Roseville, Rocklin and Lincoln to require new development within city limits to mitigate impacts on facilities and services within the Sunset Area." Rocklin staff is unclear regarding the intent of this policy and how it would actually become an issue. For example, if land use plans within the Cities remain as currently adopted, it appears there would be no impacts to the SAP. Perhaps at minimum the language should be clarified to specifically address any future land use changes that result in significant increases in density or intensity, although again the specific type of impacts to the SAP are unclear. Staff would also note that since the year 2000 the City of Rocklin has already been collecting Placer County Capital Facilities Impact Fees on all residential and non-residential development projects in the City to off-set impacts to various County services and facilities. In fact, this type of model in reverse should be seriously considered as a more effective means for the County to off-set some, if not all, impacts to adjacent cities that will be created by the SAP/PRSP developments and we invite further discussion of this concept. Ideally a commitment to collect and transmit such impact fees to the Cities would be executed and implemented prior to any actual development being approved in the PRSP / SAP areas.

3-19

Thank you again for the opportunity to provide our comments on the Draft EIR. If there are any questions regarding the above comments or if you would like to discuss any of the comments further, please do not hesitate to ask. Staff looks forward to a continuing dialog with Placer County.

Sincerely,



David Mohlenbrok
Community Development Director

- cc: City Manager
- Assistant City Manager
- City Councilmembers
- City Attorney's Office
- Laura Webster, Director of Long-Range Planning
- Dave Palmer, City Engineer

Letter 3	City of Rocklin David Mohlenbrok, Community Development Director February 22, 2019
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- 3-1 The comment states that the EIR “discussion should also acknowledge that the project itself has the potential to introduce new residential development and other sensitive land uses in close proximity to WRSL due to the project’s proposal to reduce existing landfill buffer distances.” To clarify, 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 Draft EIR properly analyzes impacts associated with the landfill against existing conditions and existing sensitive receptors, not sensitive receptors that may exist in the future. Note, too, that the discussion of Impact 4.10-2 considers how future sensitive receptors would potentially result in impacts related to incompatibility of the WRSL with the proposed project. The issues raised by the commenter regarding the Draft EIR’s odor analysis in the Air Quality section are addressed by the Draft EIR’s discussion of land use compatibility in the Land Use section (Impact 4.10-2). Ultimately, the comment indicates that additional mitigation measures should be adopted and that the cost burden should not be left to taxpayers. See Master Response 4: Odors for a detailed discussion of the Draft EIR’s analysis of odor and land use impacts and for other details related to WRSL operations. Master Response 4 includes additional mitigation measures, including fair-share funding for odor reduction measures that would be implemented by WPWMA.
- 3-2 The comment suggests that Policy TM-1.9 incorporate payment towards or construction of off-site mitigations where impacts occur outside Placer County. Policy TM 1.9 has been modified to require that traffic impact studies be prepared for future development projects that are proposed after the 20-year level of development has been reached. See response to comment 4-13 for additional details and the specific revisions to the policy.
- 3-3 The comment expresses concern regarding the trip generation rate used for the EMU zone of the SAP. Fehr & Peers conducted a trip generation evaluation for the EMU area that compared the number of EMU trips included in the traffic modeling with the trip generation of regional retail, recreation, and conference center uses (i.e., the type of uses allowed in the EMU district). Based on this evaluation, the number of EMU daily trips reflected in the Draft EIR traffic analysis adequately covers the EMU area. The EMU trip generation in the Draft EIR is 2.7 times more than the number of daily trips generated by the Westfield Galleria at Roseville shopping mall and more than 10 times more than the Sacramento Convention Center. Furthermore, this evaluation showed that where relevant floor area data was available, the daily vehicle trip generation rate for these regional retail, recreation, and conference center uses was less than the 26 daily trips per KSF used in the Draft EIR traffic modeling.
- At this time, it is speculative to include a large capacity event venue in the traffic modeling as it is not specifically proposed as part of the project and is only one of many potential uses that could be considered in the EMU district. Also, the nature of “special events” is that they occur infrequently and should be handled accordingly. The County will require a more detailed traffic analysis if a venue is proposed that is capable of hosting large special events that attract occasional large crowd volumes. Since the Draft EIR was released, the County added a new policy to the SAP that requires traffic management procedures for special events, including notification to adjacent jurisdictions and notification of temporary closures or alternative routes.
- 3-4 The comment expresses concern regarding the change in ADT on Whitney Ranch Parkway presented in Exhibit 4.14-11 on page 4.14-47 of the Draft EIR. See response to comment 1-1 regarding the project’s anticipated redistribution of existing trips. This redistribution is anticipated to shift some trips from Wildcat Boulevard to Industrial Avenue, as shown in Exhibit 4.14-11. There is also a very

minor effect on existing volumes on Whitney Ranch Parkway east of Wildcat Boulevard (slight increase from 6,500 to 6,600 ADT) as a few trips from Whitney Ranch shift to travel to new destinations west in the PRSP area.

- 3-5 The comment raises a question regarding the land use inputs used in the cumulative traffic analysis presented on page 4.14-94 of the Draft EIR. As described on page 4.14-93 of the Draft EIR, the land use inputs for the cumulative traffic analysis considers the SACOG 2036 projections. SACOG's 2036 projections do not anticipate buildout of the Lincoln General Plan, hence 2036 levels of market absorption are included for both residential and non-residential uses. Similarly, Rocklin's non-residential capacity is not expected to buildout by 2036; but residential buildout is included. Full buildout of the City of Roseville is necessary to remain consistent with the City of Roseville's analysis of Amoruso Ranch. Similarly, the Amoruso Ranch EIR included buildout of the Regional University Specific Plan and Phase 1 of Placer Vineyards in Placer County.
- 3-6 The comment expresses concern regarding Mitigation Measure 4.14-5, which includes prohibiting U-turn movements and the payment of fair share impact fees. As described in Impact 4.14-18 of the Draft EIR, the cumulative traffic analysis shows that U-turn prohibitions at City of Rocklin intersections would not be necessary when reasonably foreseeable regional roadway improvements are considered. The traffic generated by the proposed project would occur over an extended period of time, and the 20-year land use development totals that are included in the Draft EIR's cumulative plus project analysis would occur together with these regional roadway improvements. Mitigation Measure 4.14-5 requires the payment of fees associated with signalized intersections in the City of Rocklin. Placer County, in working with the City of Rocklin in good faith to provide for funding of improvement not already subject to an existing interagency fee program, has incorporated language into the PRSP Development Agreement to provide fair-share funding for improvements at City of Rocklin locations. Development within the net SAP area would be subject to the mitigation measure.
- 3-7 The comment requests that mitigation measures improve the LOS at intersections impacted in the City of Rocklin to LOS C per Policy C-10 in the City of Rocklin General Plan. Implementation of Mitigation Measures 4.14-18a and 4.14-18b would mitigate the project's cumulative effect at City of Rocklin intersections by restoring traffic conditions to their Cumulative No Project LOS or better and, therefore, the project's cumulative effects have been adequately addressed per CEQA requirements. Identifying further improvements that address LOS shortfalls not caused by the project is not required.
- 3-8 See response to comment 3-7 regarding the application of the City of Rocklin General Plan Policy C-10 in light of CEQA requirements.
- 3-9 The comment requests that graphics be prepared that superimpose proposed widening, lane additions, or other reconfigurations identified in the Draft EIR mitigation measures at City of Rocklin intersections over existing aerial photos to demonstrate how they would conceptually be implemented. The improvements identified in Mitigation Measures 4.14-18a and 4.14-18b were overlaid on aerial imagery of the identified intersections to verify their feasibility. This evaluation determined that the improvements in Mitigation Measure 4.14-18a can be completed as a striping improvement with no physical widening of the roadway. See response to comment 3-10 regarding the improvements described in Mitigation Measure 4.14-18b.
- 3-10 The comment requests further explanation of the proposed improvements to the Pacific Street/Sunset Boulevard intersection identified in the Draft EIR's mitigation measures. The improvements identified at the Pacific Street/Sunset Boulevard intersection in Mitigation Measure 4.14-18b were overlaid on aerial imagery to verify their feasibility. This evaluation determined that the improvements in Mitigation Measure 4.14-18b could be implemented as a striping improvement with no physical widening of Sunset Boulevard and Pacific Street beyond what is already anticipated in the Rocklin General Plan and included in the Cumulative No Project scenario.

3-11 The comment expresses concern regarding the amount of traffic that would divert onto Rocklin streets to avoid traffic congestion on SR 65 and the resulting impact of this traffic. The comment further suggests that the proposed land uses be scaled back or a “trip cap” be established to reduce congestion on SR 65. As described on page 4.14-131 of the Draft EIR, the traffic forecasting models used in this analysis includes improvements to SR 65 and Interstate 80 (I-80) that are included in the financially constrained project list in the SACOG 2036 MTP/SCS. As described on page 4.14-96 of the Draft EIR, these cumulative traffic forecasts reflect the resulting travel patterns that are caused by the congested conditions on SR 65 with these SACOG 2036 MTP/SCS financially constrained projects. This includes an increase in trips using parallel local streets (e.g., Industrial Avenue, Wildcat Boulevard) in response to the forecasted congestion. The amount of traffic using local streets is based on outputs from the Placer County travel forecasting model, the standard model used to forecast traffic volumes in this geographic area.

The comment expresses concern regarding traffic impacts under the cumulative traffic scenario and suggests that the densities and intensities of the proposed land uses should be scaled back to better coincide with the capacities of infrastructure (transportation) that will be available and points to the use of “Trip Caps” as a way to address the issue. In response, SAP Policy TM-1.9 Additional Traffic Impact Mitigation has been modified. See response to comment 4-13.

- 3-12 See response to comment 3-10 regarding explanation of the proposed improvements to the Pacific Street/Sunset Boulevard intersection identified in Mitigation Measure 4.14-18b.
- 3-13 See response to comment 3-3 regarding explanation of the proposed improvements to the Pacific Street/Sunset Boulevard intersection identified in Mitigation Measure 4.14-18b.
- 3-14 See response to comment 3-2 regarding the proposed changes to Policy TM-1.9 and the additional traffic analysis required of projects that exceed the EIR’s projected 20-year development totals.
- 3-15 The comment suggests that the public services analysis should have discussed how additional firefighters would be deployed. The comment also suggests that the development of all necessary fire station facilities should be tied to specific development milestones. The comment expresses concern about the impact to Rocklin’s emergency response times with additional project traffic on major arterials and SR 65.

As required by Mitigation Measures 4.13-1a and 4.13-1b in the Draft EIR, project proponents shall annex into an existing County Service Area (CSA) Zone of Benefit or create a Community Facilities District (CFD) to fund the revenue required for operations, training, maintenance, and personnel costs associated with maintaining the staffing ratios identified in Table 4.13-5 on page 4.13-24 of the Draft EIR. Additionally, Mitigation Measure 4.13-1b requires a new fire station to serve the project. These mitigation measures include timing and performance standards and would reduce impacts to a less-than-significant level. In addition, Placer County Fire oversees protection planning and fire and emergency services for the County. The first fire station already exists in the net SAP area and is known as Station #77. PRSP Parcel PR-71 has been identified as a potential site for the second station or any parcel within the PRSP area with a General Commercial Mixed Use, or Campus Park land use designation. The PRSP area would annex into the Placer County Fire Facility Fee Program which provides a mechanism to fund the construction of fire facilities needed to serve new growth areas. The net SAP area is already within the Placer County Fire Facility Fee Program and all new development would pay its corresponding fee at the time of building permit issuance. Placer County Fire anticipates that the second fire station would be needed around 25 percent buildout of PRSP or as otherwise determined by the County. County staff would work with Placer County Fire to determine the appropriate time for planning and construction for the second fire station within the PRSP area.

Regarding congestion-related effects to emergency response times, provision of additional emergency service facilities and personnel required by mitigation measures discussed above, as well as mitigation measures identified in the Draft EIR to reduce project-related traffic congestion would also reduce effects to emergency response times. The Draft EIR also includes mitigation measures requiring preparation of a construction management plan to minimize the potential for project-related construction activities to interfere with emergency response (Draft EIR page 4.8-39).

To provide additional clarity regarding timing, Mitigation Measure 4.13-1b on page 4.13-27 of the Draft EIR is revised as follows:

Mitigation Measure 4.13-1b: Fire stations (Net SAP Area and PRSP Area)

A minimum of two fire stations ~~shall be constructed~~ are needed to serve the net SAP and PRSP areas. Both fire stations will be located within the SAP/PRSP area and shall be fully funded and equipped. ~~The specific locations for the fire stations and fire station design will be identified in coordination with the Placer County Fire Department.~~ The first fire station already exists in the net SAP area and is known as Station #77. PRSP Parcel PR-71 has been identified for the second station or any parcel within the PRSP area with a General Commercial, Commercial Mixed Use, or Campus Park land use designation. The fire stations will be constructed as needed to serve development and maintain staffing ratios. Placer County Fire anticipates that the second fire station will be needed at approximately 25 percent buildout of the PRSP. The second fire station's location, design, and construction will be identified in coordination with Placer County Fire, and the fire station will be constructed as its necessity as determined by the County based upon development and staffing ratios. The timing and triggers for construction of the fire station are outlined in the PRSP Development Agreement. Funding shall be provided pursuant to Mitigation Measure 4.13-1a.

- 3-16 The comment suggests that a sheriff's substation should be planned within the SAP area. The comment also requests mitigation language acknowledging the need for the City of Rocklin Police Chief to meet with the Placer County Sheriff should service requests associated with the project area extend beyond routine levels. The comment also suggests that additional traffic generated by the project, particularly Sac State–Placer Center, would increase the possibility of additional accidents on Rocklin streets and could create the need for additional law enforcement services, additional road maintenance, and a decrease in Rocklin emergency response times.

As noted on page 4.13-28 of the Draft EIR, a sheriff's substation is currently identified to be located in the Placer Vineyards Specific Plan area, approximately 5 miles southwest of the project area. This substation, once developed, would serve the project area and accommodate the anticipated staff needs for the project area. The Sac State—Placer Center would include its own law enforcement staff and would not increase demand for law enforcement in the area.

See response to comment 3-15 for information regarding congestion-related effects to emergency services.

- 3-17 The comment questions whether the use of the Pleasant Grove Retention Facility by the project for volumetric stormwater retention would diminish capacity of the facility to accommodate other development in the region that are programmed to use the facility. The Draft EIR evaluates the impacts associated with a re-designed retention basin that includes the necessary increase in capacity for the proposed project beyond what was previously approved and evaluated in the City's EIR. The Draft EIR states (page 3-69):

Although the City's proposed volumetric retention basin was evaluated at a program-level in an EIR prepared by the City, the SAP/PRSP project would require expansion of the facility beyond its current approved design. This EIR evaluates the potential environmental impacts associated with a larger retention facility. It should be noted, however, that the City of

Roseville, or County/City JPA (or other agreement) would be the CEQA lead agency for the Pleasant Grove Retention Facility project, and additional CEQA review would be required before the facility could be constructed.

Other development that would rely on volumetric retention capacity at the Pleasant Grove Retention Facility that would be beyond the capacity designed and evaluated in the City's previous EIR was not included in the design assumptions for the retention facility evaluated in the SAP/PRSP Draft EIR. Such capacity exceedances and associated increases would need to be evaluated in CEQA documents associated with those other developments.

- 3-18 The comment states that the Draft EIR should have analyzed an alternative that implements the current 1-mile buffer from the landfill for sensitive uses including all new residential as well as the University campus. See Master Response 1: Alternatives Analysis for a general discussion regarding the adequacy of the Draft EIR's alternatives analysis. Master Response 2: Citizen-Initiated Smart Growth Plan describes the constraints related to an alternative design that maintains the 1-mile landfill buffer. As described in the master response, the 1-mile buffer around the centrally located WPWMA property, excludes the entire center of the SAP area, leaving only the corners and edges for development of sensitive land uses (including the Sac State-Placer Center, other schools, and residential land uses). Much of the land in these areas is currently developed with industrial and warehouse uses. In essence, the resulting alternative would closely resemble the 1997 SIA Plan, which is already included in the Draft EIR's alternatives analysis as the No Project Alternative.
- 3-19 The comment requests clarification on SAP Draft Policy PF-2.9 and references the collection of Capital Facility Fees. SAP Policy PF 2.9 has been deleted in the Final SAP. To reflect this change in the Draft EIR, the fourth bullet on page 4.13-22 of the Draft EIR is revised as follows:

~~▲ **Policy PFS 2.9: Consultation with Neighboring Cities.** The County shall consult with the cities of Roseville, Rocklin and Lincoln to require new development within city limits to mitigate impacts on facilities and services within the Sunset Area.~~

Also, the fourth bullet on page 4.15-33 of the Draft EIR is revised as follows:

~~▲ **Policy PFS 2.9: Consultation with Neighboring Cities.** The County shall consult with the cities of Roseville, Rocklin and Lincoln to require new development within city limits to mitigate impacts on facilities and services within the Sunset Area.~~

The City of Rocklin collects the Countywide Capital Facility fee to mitigate impacts from new growth on countywide facilities that provide general governmental services to residents who live in Placer County pursuant to Resolution No. 200-108 adopted by the Rocklin City Council and the Fee Collection Agreement entered into by the City of Rocklin dated July 10, 2000. See also Master Response 9: Mitigation and Development Fees.