

**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
a California Way of Life.*

June 12, 2017

GTS# 03-PLA-2017-00067  
03-SAC-80 PM 16.847  
SCH# 2017052042

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

**Mill Creek Single Family Residential**

Dear Ms. 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 the demolition of existing onsite structures and the construction of 308 single family home sites with three parks. A 16.8 acre open space area is to remain on the east side of the site. The project is located on multiple parcels situated in the county of Placer, south of PFE Road, east of Cook Riolo Road and east of Antelope North Road. The following comments are based on the Notice of Preparation of an Environmental Impact Report (NOPEIR) received.

***Vehicle Miles Travelled (VMT)***

In response to the provisions of Senate Bill 743, we encourage the integration of transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths, as well as achieve a high level of non-motorized travel and transit use. As such, we encourage the evaluation of the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. The Department also seeks to reduce serious injuries and fatalities, as well as provide equitable mobility options for people who

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

Ms. Shirlee Herrington, Placer County Community Development Resource Agency  
June 12, 2017  
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are economically, socially, or physically disadvantaged. Therefore, we encourage the evaluation of the project site for access problems, VMT, and service needs that may need to be addressed.

***Traffic Operations/Forecasting and Modeling***

The project is expected to generate 237 a.m. peak hour trips and 314 p.m. peak hour trips as per the ITE Trip Generation Manual, 8th edition. The NOP states that a Traffic Impact Study (TIS) will be prepared for the project.

- 1) The EIR must include a traffic analysis to determine potential impacts to both State and local transportation facilities within the project area.
- 2) The environmental document should also address complete streets needs within the vicinity of the project as well as multi modal (vehicle, bike, pedestrian, transit) transportation opportunities for the new residential and commercial building occupants. Project proponents should consider whether there will be a reduction or an increase in VMT with the project.

Please provide our office with copies of any further actions regarding this project. 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—North

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## Central Valley Regional Water Quality Control Board

9 June 2017

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

CERTIFIED MAIL  
91 7199 9991 7036 6990 6873

### **COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, MILL CREEK SINGLE FAMILY RESIDENTIAL PROJECT, SCH# 2017052042, PLACER COUNTY**

Pursuant to the State Clearinghouse's 18 May 2017 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environment Impact Report* for the Mill Creek Single Family Residential Project, located in Placer County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

#### **I. Regulatory Setting**

##### **Basin Plan**

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources

Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:  
[http://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/](http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/).

### **Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Policy is available on page IV-15.01 at:  
[http://www.waterboards.ca.gov/centralvalleywater\\_issues/basin\\_plans/sacsjr.pdf](http://www.waterboards.ca.gov/centralvalleywater_issues/basin_plans/sacsjr.pdf)

In part it states:

*Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.*

*This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.*

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

## **II. Permitting Requirements**

### **Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan

(SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml).

### **Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/municipal\\_permits/](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/).

For more information on the Caltrans Phase I MS4 Permit, visit the State Water Resources Control Board at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/caltrans.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/caltrans.shtml).

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/phase\\_ii\\_municipal.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml)

### **Industrial Storm Water General Permit**

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/industrial\\_general\\_permits/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml).

### **Clean Water Act Section 404 Permit**

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the

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<sup>1</sup> Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

#### **Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance (i.e., discharge of dredge or fill material) of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

#### **Waste Discharge Requirements**

##### *Discharges to Waters of the State*

If USACOE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

##### *Land Disposal of Dredge Material*

If the project will involve dredging, Water Quality Certification for the dredging activity and Waste Discharge Requirements for the land disposal may be needed.

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/help/business\\_help/permit2.shtml](http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml).

#### **Dewatering Permit**

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver) R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2003/wqo/wqo2003-0003.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf)

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/waivers/r5-2013-0145\\_res.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf)

### **Regulatory Compliance for Commercially Irrigated Agriculture**

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: [http://www.waterboards.ca.gov/centralvalley/water\\_issues/irrigated\\_lands/app\\_approval/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/app_approval/index.shtml); or contact water board staff at (916) 464-4611 or via email at [IrrLands@waterboards.ca.gov](mailto:IrrLands@waterboards.ca.gov).
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at [IrrLands@waterboards.ca.gov](mailto:IrrLands@waterboards.ca.gov).

### **Low or Limited Threat General NPDES Permit**

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering

discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2013-0074.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf)

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2013-0073.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf)

### **NPDES Permit**

If the proposed project discharges waste that could affect the quality of the waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit.

For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/help/business\\_help/permit3.shtml](http://www.waterboards.ca.gov/centralvalley/help/business_help/permit3.shtml)

If you have questions regarding these comments, please contact me at (916) 464-4644 or [Stephanie.Tadlock@waterboards.ca.gov](mailto:Stephanie.Tadlock@waterboards.ca.gov).



Stephanie Tadlock  
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento



**City Manager**  
311 Vernon Street  
Roseville, California 95678-2649

June 15, 2017

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

**Subject: Mill Creek Single Family Residential Project – Response to Notice of Preparation**

The City appreciates the opportunity to review and comment on the CEQA Notice of Preparation (NOP) for the proposed Mill Creek Single Family Residential project.

Water Supply/Transmission. The NOP indicates that water supply will be by PCWA wheeled to Cal-American Water Company via the City of Roseville owned and operated water distribution system including a 24-inch water main on PFE Road and a 36-inch water main on North Antelope Road. The applicant shall coordinate with the City of Roseville Environmental Utilities Department Water Division regarding any proposed connections to City owned transmission infrastructure (Contact Jim Mulligan (916) 774-5668). The applicant will also need to coordinate with the City and Cal-American Water Company to determine how to meter water from those facilities. EIR mitigation measures should address these concerns.

Wastewater Conveyance and Treatment. Three options are presented for sewer collection in the NOP. Each will require analysis to confirm capacity is available in the existing portions of the collection system. The chosen option will be at the City's discretion and should be the proposed option evaluated in the EIR.

With respect to anticipated wastewater demands, the EIR analysis should determine if the preferred wastewater collection option is in conformance with assumptions used in the South Placer Wastewater Authority (SPWA) Systems Evaluation Report (2009). The EIR analysis should confirm the project's sewer generation rates are no higher than those identified in the System Evaluation Report. If sewer generation rates are higher, available capacity at the Dry Creek WWTP will need to be confirmed to ensure the development can be accommodated. Any required offsite improvements to City owned wastewater facilities shall be coordinated with Roseville's Environmental Utilities Wastewater Division. EIR mitigation measures should address these concerns. To ensure an appropriate and adequate EIR wastewater analysis, the City highly recommends coordination of the administrative draft EIR wastewater analysis with the Roseville Environmental Utilities Department (Contact Dale Olson 774-5543).

Parks. The EIR should evaluate the adequacy of proposed parks to meet project generated demand for active park use and programmable space and facilities. One regulation size soccer field requires 2 acres without support amenities. The city is concerned that the proposed park sizes (1.6, 1.3 and 1.3 acres) don't allow for active recreational facility development consistent with demands generated by this and similar projects. Unmet County needs increase demand for City recreation programs (some of which are already impacted) and results in greater use of City active park facilities increasing maintenance costs and reducing the useful life of certain facilities. While this project alone may not create a major impact, the City is concerned that this type of subdivision design contributes to a cumulative impact to City of Roseville active recreation facilities and programs. To address cumulative effects, the EIR should analyze the potential to combine some of the onsite park acreage to provide larger contiguous areas that can support active programmed facilities (like soccer and softball/baseball fields) internal to the project. The EIR should also consider development of a West Placer Parks and Recreation Master Plan and related fee program as potential cumulative impact mitigation.

Traffic and Circulation – Regarding the scope of traffic analysis, the City requests two additional signalized intersections already operating at a LOS D in the cumulative condition be evaluated for impacts. These include:

- Cook Riolo Road/Baseline Road
- Walerga Road/Baseline Road

Thank you for the opportunity to review and comment on the NOP. Should you have any questions, please don't hesitate to contact those staff listed above.

Sincerely,



Mark Morse  
Environmental Coordinator

June 21, 2017

SENT VIA E-MAIL: SHerring@placer.ca.gov

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

**SUBJECT: Notice of Preparation of a Draft Environmental Impact Report for Proposed Mill Creek Single Family Residential Project**

Ms. Herrington,

Thank you for submitting the **Notice of Preparation of a Draft Environmental Impact Report for Proposed Mill Creek Single Family Residential Project** (Project) to the Placer County Air Pollution Control District (District) for review and comment. The Project consists of the demolition of existing onsite structures and construction of 308 single-family home sites and three parks. A 16.8-acre open space area would be retained on the east side of the site. The District provides the following comments for consideration.

1. The District's Board of Directors adopted CEQA Thresholds of Significance for criteria pollutants and Greenhouse Gas (GHG) on October 13, 2016. The following tables summarize the adopted thresholds:

Criteria Pollutant Thresholds								
Construction Phase			Operational Phase Project-Level			Operational Phase Cumulative-Level		
ROG	NOx	PM <sub>10</sub>	ROG	NOx	PM <sub>10</sub>	ROG	NOx	PM <sub>10</sub>
(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)
82	82	82	55	55	82	55	55	82

Greenhouse Gas Thresholds			
<b>Bright-line Threshold</b> 10,000 MT CO <sub>2</sub> e/yr			
Efficiency Matrix			
Residential		Non-residential	
Urban	Rural	Urban	Rural
(MT CO <sub>2</sub> e/capita)		(MT CO <sub>2</sub> e/1,000sf)	
4.5	5.5	26.5	27.3
<b>De Minimis Level</b> 1,100 MT CO <sub>2</sub> e/yr			

The District recommends applying the District's adopted thresholds to determine the level of significance for the Project's related criteria pollutants and GHG impacts.

2. The District's California Environmental Quality Act (CEQA) Air Quality Handbook (Handbook) provides recommended analytical approaches and feasible mitigation measures when preparing air quality analyses for land use projects. The Handbook is available on the District's website at <http://www.placerair.org/landuseandceqa/ceqaairqualityhandbook>. Except where noted below additional detail relating to the following recommended items can be found within the Handbook.

- The Project is located within the Sacramento Valley Air Basin (SVAB) and is under the jurisdiction of the District. The SVAB is designated as nonattainment for federal and state ozone (O<sub>3</sub>) standards, nonattainment for the federal particulate matter standard (PM<sub>2.5</sub>) and state particulate matter standard (PM<sub>10</sub>). Within the Air Quality section of the Initial Study, the District recommends the discussion include the area designations for the federal and state standards for the SVAB.
- The California Emissions Estimator Model (CalEEMod) is recommended when estimating the Project related air pollutants emissions from construction and operational phases. CalEEMod quantifies criteria pollutant emissions, including greenhouse gases (GHGs) from construction and operation (including vehicle use), as well as GHG emissions from energy production, solid waste handling, vegetation planting and/or removal, and water conveyance. In addition, CalEEMod calculates the benefits from implementing mitigation measures, including GHG mitigation measures, developed and approved by CAPCOA. During 2016, the CalEEMod Version 2016.3.1 was released which incorporates the California Air Resources Board's OFFROAD and EMFAC 2014 updates. No prior versions of CalEEMod should be used. Please contact the District for information on appropriate default settings applicable to the project area.

The District requests copies of all modeling analysis files during the review of the DEIR for public review and comment.

- In the event the air quality analysis demonstrates the potential for the Project to cause or generate significant adverse air quality related impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. Additional mitigation measures can be found in the District's CEQA Handbook within the following related appendices.

**Appendix A. Recommended Mitigation Measures (Construction)**

**Appendix B. District Rules and Regulations (Construction)**

**Appendix C. Recommended Mitigation Measures (Operational)**

**Appendix D. District Rules and Regulations (Operational)**

**Appendix G. Mitigation Measures (Greenhouse Gases)**

3. As previously stated, the Project is located within the SVAB and is designated nonattainment for the PM<sub>2.5</sub> standard. PM has been linked to a range of serious respiratory and cardiovascular health problems<sup>1</sup>. Wood burning devices are a source of PM emissions which contribute to the region's air pollution. The District recommends that the construction, installation or use of wood burning devices be prohibited within the Project area. Only natural gas or propane fired fireplace appliances shall be allowed. These appliances shall be clearly delineated on the Floor Plans submitted in conjunction with the Building Permit application.
4. The District recommends a CALINE 4 modeling analysis for carbon monoxide (CO) concentration be performed and discussed within the environmental document if any intersection or roundabout is determined by the traffic study to degrade to a level of service "E" or "F" as a result of this project, alone or cumulatively; or where the total project-level CO emissions exceed 550 lbs/day.
5. The District recommends that the DEIR identify and analyze potential health impacts from locating land uses, where sensitive individuals are most likely to spend time (i.e., schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities), that are within 500 feet to any existing or proposed major road ways (urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day), as well as stationary sources, where there is the potential for exposure to toxic air contaminants (TAC) and other hazardous air pollutants (e.g., such as diesel particulate matter (DPM) from diesel exhaust). If an impact is identified, the DEIR should describe the level of analysis, such as a Health Risk Assessment (HRA) or other modeling analysis, necessary to determine if the Project will have the potential to cause adverse health impacts.

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<sup>1</sup> <http://www.epa.gov/ncer/science/pm/>

Additionally, the following strategies are recommended by the California Air Resources Board to minimize health related impacts on sensitive receptors proposed within close proximity to any identified major road way or stationary source. Currently, the project is located next to an area, east of it, which has numerous auto repair shops along with one company, Vulcan Materials Company, which is an asphalt concrete plant. These sites all can have odors, which travel offsite. Additional guidance is provided within Chapter 4 of the District's Handbook.

- Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day;
- Avoid siting new sensitive land uses within 1,000 feet of a distribution center;
- Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation, from the property lines is recommended for typical gas dispensing facilities.

Thank you for allowing the District this opportunity to review the project proposal. Please do not hesitate to contact me at 530.745.2327 or [ahobbs@placer.ca.gov](mailto:ahobbs@placer.ca.gov) if you have any questions.

Sincerely,



Ann Hobbs  
Air Quality Specialist  
Planning & Monitoring Section

cc: Yushuo Chang, Planning & Monitoring Section Supervisor



***Sent Via E-Mail***

June 15, 2017

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

Subject: Notice of Preparation of an Environmental Impact Report for the  
Proposed Mill Creek Single Family Residential Project  
(Clearinghouse No. 2017052042)

Dear Ms. Herrington:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Proposed Mill Creek Single Family Residential Project. SMUD is the primary energy provider for Sacramento County and the proposed Project area. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed Project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

There are existing overhead SMUD facilities along Antelope Road, Cook Riolo Road, and PFE Road adjacent to the Project site. Accordingly, it is our desire that the EIR for the Proposed Mill Creek Single Family Residential Project will acknowledge any Project impacts related to the following:

- Overhead and or underground transmission and distribution line easements. Please view the following links on [smud.org](http://smud.org) for more information regarding transmission encroachment:
  - <https://www.smud.org/en/business/customer-service/support-and-services/design-construction-services.htm>
  - <https://www.smud.org/en/do-business-with-smud/real-estate-services/transmission-right-of-way.htm>
- Utility line routing
- Electrical load needs/requirements

- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery

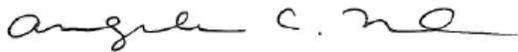
Based on our review of the NOP and our understanding of the Proposed Project, SMUD requests that the following issues be considered during the Project design and planning and any associated impacts be considered in the EIR:

- All structural setbacks shall be a minimum of 14-feet from the edge of the roadway right-of-way. Structural setbacks less than 14-feet shall require the Applicant to conduct a pre-engineering meeting with all utilities to ensure proper clearances are maintained.
- In the event the Applicant requires the relocation or removal of existing SMUD facilities on or adjacent to the subject property, the Applicant shall coordinate with SMUD. The Applicant shall be responsible for the cost of relocation or removal.
- The Applicant shall not place any building foundations within 5-feet of any SMUD trench to maintain adequate trench integrity. The Applicant shall verify specific clearance requirements for other utilities (e.g., Gas, Telephone, etc.)
- Any necessary future SMUD facilities located on the Applicant's property shall require a dedicated SMUD easement. This will be determined prior to SMUD performing work on the Applicant's property.
- The Applicant shall dedicate and provide all-weather vehicular access for service vehicles that are up to 26,000 pounds. At a minimum: (a) the drivable surface shall be 20-feet wide; and (b) all SMUD underground equipment and appurtenances shall be within 15-feet from the drivable surface.
- The Applicant shall dedicate a 12.5-foot public utility easement for overhead and/or underground facilities and appurtenances adjacent to all public street rights-of-ways.
- The Applicant shall dedicate any private drive, ingress and egress easement, or Irrevocable Offer of Dedication (and 10-feet adjacent thereto) as a public utility easement for (overhead and) underground facilities and appurtenances. All access roads shall meet minimum SMUD requirements for access roads.

SMUD would like to be involved with discussing the above areas of interest as well as discussing any other potential issues. We aim to be partners in the efficient and sustainable delivery of the proposed Project. Please ensure that the information included in this response is conveyed to the Project planners and the appropriate Project proponents.

Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this Project. Again, we appreciate the opportunity to provide input on this NOP. If you have any questions regarding this letter, please contact Kim Crawford at [kim.crawford@smud.org](mailto:kim.crawford@smud.org) or (916)732-5063.

Sincerely,



Angela C. McIntire  
Regional & Local Government Affairs  
Sacramento Municipal Utility District  
6301 S Street, Mail Stop A313  
Sacramento, CA 95817  
[angela.mcintire@smud.org](mailto:angela.mcintire@smud.org)

Cc: Kim Crawford, SMUD  
Leonardo Franciosa, SMUD  
Gary Shimizu, SMUD

**Public Comment Form**

for the Notice of Preparation for **Mill Creek Single Family Residential** (PLN16-00103,State Clearinghouse# 2017052042)

<http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/millcreekresidential>

Scoping Meeting Date: <u>June 16, 2017</u> Public Review Period: <u>05/8/17</u> Your comments must be postmarked by <b>June 16, 2017</b> ../ Comments must be written legibly with complete contact information in order to be considered. ../ Comments are preferred by email to <a href="mailto:cdraecs@placer.ca.gov">cdraecs@placer.ca.gov</a> , or By Fax               530-745-3080 By Mail             Environmental Coordination Services, Placer County Community Development Resource Agency, 3091 County Center Drive, Suite 190, Auburn CA 95603 ../ Please attach additional pages if more space is needed.
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These comments are referencing the Mill Creek Single Family Residential Proposal (PLN 16-00103, State

Clearinghouse #2017052042). My husband and I are concerned about many factors that will be affected by this proposal, primarily the aesthetics of the area, implications and loss to wildlife and damage to the rural environment. One of our major concerns is about traffic along the PFE corridor and adjacent streets (Cook Riolo Road, Walerga, PFE/Atkinson and North Antelope). There are a number of housing developments either being built, established or proposed. The most immediate issue is the surge of building-related vehicles, particularly on PFE. Once all the developments are established the residential and commercial vehicle flow will be beyond the current capacity. Do we want more multi-lane thoroughfares or should we try to maintain the rural aesthetics of this area? Please reference the accompanying pdf file, Placer\_Building\_MillCreek.pdf that illustrates the number of developments that will eventually be established in this area.

Your Name Joanne and Michael Banducci

Mailing Address 9725 Cook Riolo Road

City Roseville

State CA

Zip 95747

Email jgbanducci@gmail.com

NW CORNER OF WATT  
& PFE-  
RIOLO VINEYARD  
SPECIALTY RANCH  
(Proposal)

**PFE**

NW CORNER OF PFE &  
WALERGA  
COMMERCIAL  
(Building in progress)

WALERGA –  
MARIPOSA  
FARMS  
(Building in  
progress)

**WALERGA**

NE CORNER OF PFE  
& WALERGA –  
MORGAN KNOLLS  
(Proposal)

HIDDEN  
CROSSINGS –  
(Building in  
progress)

**PFE**

MORGAN  
RANCH –  
(Building in  
progress)

MORGAN CREEK  
(Established)

WILLOW  
CREEK –  
(established)

**COOK RIOLO ROAD**

MILL CREEK – (Proposal)



We remain concerned about many aspects of this project and believe that the following items must be included within the scope of any environmental impact report associated with the project (and mitigated before the project proceeds, if at all). Specifically, in no particular order, we request the County and other entities take steps to address the following items:

1. Light pollution from street lights in the development and surrounding areas;
2. Light pollution from house lights;
3. Light pollution from residential use lights;
4. Light pollution from auto-related lights;
5. Noise pollution from increased traffic;
6. Noise pollution from increased population density and miscellaneous residential uses;
7. Visual pollution – obstruction of present views of the Sierra Nevada and related foothills;
8. Visual pollution – obstruction of present views of immediately surrounding open space and wetland;
9. Visual pollution – general view of “tract homes” immediately adjacent to property;
10. Odor pollution from complete change of use, from rural to residential use;
11. General air pollution from increased auto traffic;
12. General air pollution from miscellaneous residential uses;
13. Biological impact – impact on Dry Creek generally, given increased surface and drainage flows into tributaries;
14. Biological impact – impact on the protected salmon habitat in Dry Creek;
15. Biological impact – loss of current naturally occurring wetland;
16. Biological impact – general loss of open space that naturally occurs given current zoning;
17. Biological impact – pheasant habitat;<sup>1</sup>
18. Biological impact – crane habitat;
19. Biological impact – rabbit habitat;
20. Biological impact – fox habitat;
21. Biological impact – goose habitat;
22. Biological impact – vole habitat;
23. Biological impact – bird (general) habitat;
24. Biological impact – field mouse habitat;
25. Biological impact – coyote habitat;
26. Biological impact – duck habitat;
27. Biological impact – frog (general) habitat;
28. Biological impact – reptiles (including miscellaneous categories of lizards and snakes)
29. Traffic impact – auto (PFE corridor from Watt to North Antelope, and especially at Walerga and Cook Riolo intersections);
30. Traffic impact – pedestrian (along Cook Riolo south of PFE and along the entire PFE corridor);

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<sup>1</sup> Any review of the environmental impact of this project as it relates specifically to wildlife must be done across all months of the year as there is great seasonal fluctuation in migration patterns and presence of wildlife.



31. Street development/impact on existing property owners and use of eminent domain by public agency for benefit of private developer and private putative home-owners;
32. Street development at the south end of Cook Riolo for emergency vehicle and any other auto access (ensure no through traffic to Sacramento County, ensure no eminent domain of our property, no light pollution from street lights, etc.);
33. Aesthetics – maintaining all aspects of aesthetics in highest order so that this project does not simply become an extension of the existing development immediately adjacent to the proposed project site in Sacramento County, whether through County-imposed HOA standards, restrictions on minimum lot and house size, or any other measures to protect home values in nearby Placer County areas including but not limited to our property, Willow Creek, Morgan Creek, Morgan Ranch and other non-development related private property;
34. Impact on the Dry Creek Joint School District and school populations;
35. Economic impact: impact on value of existing custom and semi-custom homes vis-à-vis relatively small and non-descript tract homes on small lots, built at relatively high density.

In addition, we would like to better understand the specific justification for the proposed change in zoning, especially in an area where either: (1) the county will either have to expand PFE between Walerga and North Antelope, which would require exercise of eminent domain power and significant disruption of long-established residential use; or (2) residents – existing and new alike – will be faced with stifling traffic in an unincorporated county area. The already pending projects along the PFE Corridor, from Cook-Riolo to Watt, as well as the pending projects along the Baseline/Riego Corridor, only exacerbate these traffic concerns.



Geoffrey M. Hash

June 16, 2017

June 15, 2017

Placer County  
Community Development Resources Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

Attn: Shirlee Herrington, Environmental Coordination Services

Re: Notice of Preparation of an Environmental Impact Report for the Proposed Mill Creek Single Family Residential Project

Dear Ms. Herrington,

Placer County is the lead agency for the preparation of an Environmental Impact Report (EIR) for the proposed Mill Creek Project (proposed project) in accordance with the California Environmental Quality Act (CEQA), Section 15082. I appreciate the opportunity to comment on the Notice of Preparation (NOP) and contribute in a meaningful way to the development of an outstanding, innovative and remarkable living environment in west Placer County.

**Environmental Analysis:**

Through the EIR process, the County has a responsibility and duty to review all State Legislature enacted and pertaining to greenhouse gas emissions and determine whether the Mill Creek proposal conforms to policy guidelines set forth in the legislation, including but not limited to:

1. The Cortese Knox Hertzberg (CKH) Act begins with the following statement. “The Legislature finds and declares that it is the policy of the state to encourage orderly growth and development which are essential to the social, fiscal, and economic well-being of the state. The Legislature recognizes that the logical formation and determination of local agency boundaries is an important factor in promoting orderly development and in balancing that development with sometimes competing state interests of discouraging urban sprawl, preserving open-space and prime agricultural lands, and efficiently extending government services.” (§56001)
2. Governor Brown’s Executive Order B-30-15 that calls for a reduction in greenhouse gas emissions of 40% below 1990 levels by 2030. This goal has also been incorporated into SB 32 (Pavley) now under consideration by the state legislature.
3. California Air Resources Board, First Update to the Climate Change Scoping Plan, May 2014. Safeguarding California: Implementation Action Plans, Agricultural Sector Plan, California Natural Resources Agency, March 2016, at 24. This report also includes

a vivid and comprehensive description of the risks that climate change poses to California agriculture.

4. The Sacramento Area Council of Governments' (SACOG) Blueprint for sustainable growth provides goals and resources to Counties to create a jobs/housing balance in the region.

5. Senator Steinberg's SB 375 which sets regional targets for reducing greenhouse gas emissions aligning regional plans of housing needs and regional transportation planning to reduce greenhouse gas and provides CEQA incentives for development projects that are consistent with a regional plan that meets greenhouse gas reduction goals. The law also strengthens several existing requirements for public involvement.

6. Assemblyman Nunez's AB 32 The Global Warming Act of 2006 establishes a statewide greenhouse gas emissions limit such that by 2020 California reduces its greenhouse gas emissions to the level they were in 1990.

7. The American Farmland Trust's White Paper, which expands on the California Farmland Mapping Project and a report from Calthorpe Analytics and Energy Innovations studies that determined that CA's Greenhouse Gas (GHG) reduction goals will not be attained without smart-growth policies that protect farmland.

Is Placer County committed to supporting the aforementioned State Policies for GHG reduction? How does the Mill Creek project demonstrate that commitment? Please elaborate on how Placer County demonstrates this commitment for each of the aforementioned policies and legislation.

What mitigations would be required to reduce CO2 emissions from the Mill Creek project to a net zero?

### **Biological Resources:**

#### Water

California experienced its most severe drought in 1,000 years between 2011 and 2016. Is the Mill Creek development project designed in a manner that recognizes the potential for future drought? Does the project include the best available technologies to conserve water, retain water for residential use and incorporate drought tolerant landscaping?. Will the Mill Creek project employ best available conservation technologies to mitigate for drought? What are the best available in Mill Creek and explain how they will be incorporated in project development?

#### Housing and Environment:

Please describe and compare the projected water and energy use and CO2 emissions to be generated from this project (as proposed) and compare these numbers to an alternative project that may be characterized as "smart growth".

A smart growth alternative would be compact, utilize water cisterns, solar panels, create opportunities for safe bicycle use and is conducive to using public transit. Smart growth communities retain farming acreage to contribute to a livable community and sequester CO<sub>2</sub>. How can retention of the farmland on this site contribute to affordability, livability and CO<sub>2</sub> sequestration? Please provide examples of other communities in the region, which have retained farmland within the project site to support young farmers and quality of life measures of area residents.

The smart growth alternative will envision a place that is truly a desirable and affordable for populations that are chronically underserved in Placer County – young families, singles, students, artists and entrepreneurs. A smart growth Alternative for Mill Creek will have a synergistic effect of conserving farmland and mitigating climate change; while providing critically needed affordable housing. This Alternative is green, family and transit friendly throughout, with a range of housing - from single room occupancy, to lofts, to affordable single-family homes with street scale features and an art and cultural focus. This Alternative is not designed for the automobile – three and four car garages do not define the streetscape. It is designed for pedestrian livability, community interaction and smart energy use. The Mill Creek community has the potential to shatter Placer County stereotypes and puts Placer County on the regional, national and international map for innovation and livability and smart energy use. Is it conscionable to approve any development but smart growth?

A recent analysis of statewide land use patterns and future options by Calthorpe Analytics and Energy Innovations found that “implementation of smart land use policy, in combination with technological advances in the energy sector, will be critical for the state to achieve its ambitious 2030 de-carbonization target. Please analyze and compare the Greenhouse Gas (GHG) that will be emitted by the proposed project and compare it to GHG emissions from a smart growth community.

### Climate Change

There is a growing body of research that establishes the economic and social value of plants for carbon sequestration and to offset global warming. As a part of the environmental analysis, please establish that the project meets the criteria established with by the California Supreme Court in the 2015 Newhall Ranch ruling, consistent with AB 32, The Global Warming and Agricultural Land Preservation Act (2013). See Center for Biological Diversity, et al. v. California Department of Fish and Wildlife, and The Newhall Land and Farming Company, 62 Cal.4th 204 (2015)

The American Farmland Trust (AFT) has determined that communities that protect farmland buffer against climate risks. Approximately 50 acres of farmland will be lost with build out of MillCreek. How is the farmland in the project area is classified by the CA Farmland Mapping Project. What range of crops might the farmland support?

A White Paper by AFT, April 2016, called the “Agricultural Land Conservation: An Important Part of California’s Climate Strategy” sets demonstrates that providing long-

term protection for farmlands is important, if not essential, to achieving California's greenhouse gas reduction goals. Does Placer County support California's Climate Strategy and how is Placer County working to achieve the greenhouse gas reduction goals described in the AFT Strategy?

California Air Resources Board, First Update to the Climate Change Scoping Plan, May 2014. Safeguarding California: Implementation Action Plans, Agricultural Sector Plan, California Natural Resources Agency, March 2016, at 24 includes a vivid and comprehensive description of the risks that climate change poses to California agriculture. How will GHG from the Mill Creek project contribute to the risks described in the California Air Resources Board Scoping Plan?

The groundbreaking research done by Professor Louise Jackson and her colleagues at U.C. Davis (2012) was the first to establish a connection between urbanization of farmland and the increase in greenhouse gas emissions. Their work found that in Yolo County, GHG emissions from urban uses were roughly 70 times greater on a per acre basis than those from agricultural operations. A later study (2015) done for American Farmland Trust reached a similar conclusion after looking at emissions from the state's leading crops and cities throughout California.

A study published by the Duke Nicholas School for Environmental Policy Solutions (2014) compared the greenhouse reduction potential of various agricultural practices documented in the scientific literature, concluding that: "Because average greenhouse gas emissions from urban land uses are orders of magnitude higher than those from California croplands (approximately 70 times higher per unit area), farmland preservation, more than any of the other management activities, will likely have the single greatest impact in stabilizing and reducing future emissions across multiple land use categories."

How many tons of CO<sub>2</sub> will be generated from the Mill Creek project? In as much as concrete emits CO<sub>2</sub> for 25 years and the cutting of trees emits a pulse of CO<sub>2</sub>, the analysis of emissions must be comprehensive. What is the impact of projected new GHG emissions to climate change and achievement of the State's 2030 emission reduction goals?

#### Farmland

Since the mid-1980's, an average of nearly 42,000 acres of the state's agricultural land has been converted to urban uses annually. Since the mid 1980's, a cumulative total of more than one million acres of CA farmland was lost to urban uses which generate 70 times as much GHG.

If this trend continues, California will lose another 1.4 million acres of agricultural land by 2050. How many acres of Placer County farmland have been converted to urban uses since the mid 1980's? Does Placer County have a farmland conservation policy and is the proposed conversion of farmland to urban uses consistent with this policy?

Farmland conservation is a critical component of ensuring food security for the future. How does the Ca. Farmland Mapping Project describe soils in the Mill Creek project area? What crops have been historically grown and may be successfully grown on the farmland within the project site? According to AST, California Farmland is so unique, it will be imperative for California to have sufficient farmland in the right locations to allow for food production and flexibility as impacts of climate change become more severe. What does AFT mean when it describes, “right location”? Is the Mill Creek project in a “right location”?

The State has allocated money to the Sustainable Agricultural Lands Conservation program to support local governments as they implement farmland conservation policies. Please describe how the County might utilize these monies to reserve farmlands within the Mill Creek site area.

Many young people are returning to farming as a professional occupation. They are seeking affordable and arable land to operate a farm within close proximity to population centers. How many young people are being deterred from following their dream to farm by land cost and availability constraints? Does this project site create a unique opportunity for a farm/fork/quality of life interface with residential uses?

#### Natural Environment

Whether or not prior comprehensive on-the-ground biological surveys have been done, it is essential that they be done to evaluate the status and determine whether there are species of concern in the Mill Creek project site. The incidence of rare native plants must be identified. Will a comprehensive biological survey of flora and fauna be completed?

A complicated set of Federal, State, and local environmental laws and regulations now protect wetlands, because of the critical importance of these ecosystems to water quality, carbon sequestration, and flood protection, and because they support wide range of specialized habitats and animal and plant communities, including many rare species. “Wetlands are the transitional area between terrestrial and aquatic system and specialized fauna provide breeding, rearing and feeding habitat for many fish and wildlife, as well as natural flood protection and pollution control.” (EC Report, page 5-15.)

The EIR must perform on-the-ground surveys throughout the year to determine if perennial or seasonal wetland streams, grasslands and woodland areas support rare or endangered species and support or have the potential to support salmon and steelhead.

Trees and grasslands support foraging habitat for birds. Will the EIR consultant conduct a comprehensive *multi season* survey of birds that frequent the project site? Several species of concern, including raptor species, the burrowing owl and the tri-colored blackbird are among these foragers. Hawks are in a precipitous decline due to loss of open grassland habitat. What population of hawks forage in the Mill Creek

Project site? How will loss of this habitat be mitigated and what impact will it have on the current hawk population?

Wetlands within the area support migratory fowl and potentially recoverable fisheries that must be surveyed. Are the riparian and wetland resources utilized by or do they have the potential to be utilized by salmon and steelhead populations or the species at lower trophic levels upon which salmon and steelhead depend? Will alterations to drainage and hydrology have a detrimental effect on riparian and swail function? Will run off of car oil, pesticides, herbicides and household waste make its way to the riparian areas?

The Mill Creek project site is a part of the historic Pacific flyway. Having homes and large office buildings in a highly trafficked flyway will likely result in bird deaths due to bird strikes on windows. What migratory fowl and raptor population deaths are likely to occur? The impact of these losses to bird populations must be analyzed by the EIR and mitigated to the extent practical.

### **Population and Housing**

Rezone/variance request regarding maximum building coverage and lot size

The project applicant is requesting Placer County approval of the following entitlements: ozone from RS-AG-B-20 (48.5 acres), INP-Dc (34.0 acres), OP-Dc (16.8 acres), IN-UP-Dc (0.1 acre), and O (10.7 acres) to Residential Single Family, Combining Agriculture, Combining Building Site minimum of 6,000 square feet (RS-AG-B-X-6,000) (88.3 acres) and O (21.8 acres); and a Vesting Tentative Subdivision Map for the subdivision of 110.1 acres into a 308-lot single family residential subdivision; with a variance to increase allowable building coverage on residential lots from the maximum 40 percent for one story units and 35 percent for two-story units to 50 percent and 40 percent, respectively.

How does the rezoning and variance requested by the Mill Creek developers mitigate the housing crisis confronting Placer County residents who are in need of affordable ownership and rental housing? Why is the County being asked to approve more sprawling two story three car homes that in no way meet the housing needs of our population? What housing mix on the site would best reflect the population demographic of Placer County? In as much as the developer is seeking higher density that that allowed under current zoning, why is no multifamily rental and ownership housing for the 43% of Placer County residents earning our median income of d\$%75,000 per year being proposed?

The State Department of Housing and Urban Development has determined that 43% of the population of Placer County is moderate, low and very low income. Will the Mill Creek project provide ownership opportunities for people in the moderate, low and very low income as a measure to determine if the Mill Creek project will meet the housing needs of our teachers, nurses and medical support staff, merchants, service

employees, health workers? How many of the single family homes will be affordable to persons with an income of \$76,000 per year or less?

What percentage of their annual income would a family of median income in Placer County should agree to the rezone request when the project fails to meet the Mill Creek project fails to meet any affordable housing goals. Unless this project demonstrates that is making a significant contribution to providing housing that will serve families who need affordable housing in Placer County, the EIR consultant must explain why.

The request for a variance to allow an increase in maximum building coverage means that larger homes than those allowed on a 6,000 sq. ft. lot are proposed to be developed. For each additional square foot of building coverage, the cost of the home increases. By allowing the variance for maximum building coverage, the County is, in essence saying, that it is not thinking about our existing communities' need for affordable housing. Please describe the sales price for homes in each of the "village" settlements and where, among these 310 units, affordable housing units are proposed. If no affordable housing units are proposed within the project, please describe where and how 31 (10%) affordable units will be produced as required under the Placer County Housing Ordinance. The Sacramento Area Council of Governments' (SACOG) Blueprint for Sustainable Growth provides goals and resources to Counties to create a jobs/housing balance in the region. Does the Mill Creek project conform with and make a substantial contribution to, the attainment of the Blueprint's goals?

Current Placer County policy allows developers, for only \$4,000 per unit, to buy their way out of the responsibility to provide 10% moderate and low-income units within their projects. In essence, developers can circumvent the 10% affordability provisions of the AHGP for \$4,000 for unit. As the County is in the process of adopting an Affordable Housing Ordinance, which is likely to be approved before the Mill Creek Project secures its vesting tentative map, should this project be subject to the new Affordable Housing Ordinance?

## **Traffic and Circulation**

### Quality of Life

How significant is traffic congestion to a high quality of life? Will the Mill Creek EIR analyze level of service impacts to existing streets that will be utilized by Mill Creek's homeowners and the vehicles that service these homes (deliveries, maintenance etc.)?

The Placer County Transportation Commission has done extensive research on levels of service for traffic circulation and its impact on quality of life measures. Please describe the Commission's work in this regard and complementary work by industry experts. Evaluate how the introduction of an estimated 3,100 additional auto trips PER DAY will affect quality of life measure for existing residents of Sacramento and Placer County. What is the cost to existing for loss-of-work time value and quality of life measures attributable to this project? How can the project mitigate impacts to existing

resident for loss of recreational time value, mental and physical health impacts, among other factors)?

## **Conclusion**

The preparation of the EIR must include a comprehensive on-the ground survey, assessments, and analysis of biology including individual native plant and animal communities and any concerns about viability or status:

-

- A. Include flora and fauna of the entire site (including review of prior biological surveys/assessments)
- B. Identify species, establish population sizes and health of each population, and associate populations with specific wetlands and/or streams
- C. Conduct surveys at multiple times during the year because of the varying seasonal life cycles of flora and fauna, and the fact that some fauna are migratory and/or use the habitat for foraging without living within the Sunset area

This is an opportunity for the County to “refresh”. We need not be looking at yet another sprawling single-family development like those that define our expanding urban landscape. Because the developer is seeking a rezone to a higher density, this is an opportunity to create a community with many housing choices and price points that has a zero net impact on CO2 emissions. The question of future drought and designing for draught must also be explored and explained in the EIR

Greenhouse gas is jeopardizing our very existence. State and Federal policy seeks local government cooperation to adapt and implement decisions that may change the frightening climate change trajectory we are on, Does Placer County demonstrate cooperation with Federal and State government policy in its approval of the Mill Creek project? Does Placer County exhibit leadership and civic responsibility by awarding a development proposal for a smart growth project? By design - a very smart-growth community should be the standard for each project in Placer County – including Mill Creek. It just makes good sense, makes our communities more live-able and is the only “right” decision in light of the climate crisis we face.

Finally, Placer County is poised to approve an Affordable Housing Ordinance to address the housing crisis among our citizens. Any rezoning for this project must demonstrate how it meets the housing needs of our population or explain why Placer County Housing Policy and why none of the housing needs of 43 percent of our population can be met within the confines of the project site. If it cannot be met within the project site, will the developer identify a specific site where the 31 units (10% of 310 units proposed) of affordable housing will be constructed?

Thank you for the opportunity to provide comments on the Mill Creek Notice of Preparation of and EIR.

Sincerely,

Leslie Warren

2877 Allen Drive

Auburn, CA 95602