

2 REVISIONS TO THE DRAFT EIR

This chapter presents revisions to the Draft EIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections. The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute “significant new information” requiring recirculation. (See Master Response 8: Recirculation; see also Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

2.1 REVISIONS TO THE DRAFT EIR

This section presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. Text deletions are shown in strikethrough (~~strikethrough~~), and text additions are shown in underline (underline).

It should be noted that the following revisions do not change the intent or content of the analysis or effectiveness of mitigation measures presented in the Draft EIR.

2.1.1 Revisions to Chapter 1, “Introduction”

In response to comment 15-1, the second paragraph on page 1-2 of the Draft EIR is revised as follows:

This EIR evaluates the potential environmental impacts associated with implementing the SAP and PRSP. The SAP is a policy document intended to guide growth in the SAP area over a 20-year planning horizon; buildout of the SAP area is expected to occur over 80 years or more. In accordance with Section 15168 of the State CEQA Guidelines, 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. In accordance with Section 15161 of the State CEQA Guidelines, a project EIR focuses on the changes in the environment that would result from a development project. Because of the broad geography, long timeframe anticipated for buildout, and policy-oriented nature of the SAP, the impact analysis of the SAP is prepared at a programmatic level—that is, a more general analysis with a level of detail and degree of specificity commensurate with that of the plan itself, focusing on the effects that can be expected to follow from adoption of the plan. The PRSP, however, is assessed at a project level in this EIR, because project details are developed to a sufficient degree that environmental effects that would result from development of the PRSP can be identified and assessed with greater certainty, and specific mitigation measures developed to address potentially significant impacts. The Sac State–Placer Center portion of the PRSP, however, remains conceptual; the university has yet to develop project-specific detail in the form of a master plan for the campus. ~~This EIR provides substantial analysis of the university campus based on the information available and will provide valuable streamlining for future decisions by the California State University (CSU), but additional environmental review may be required by the CSU, which would serve as lead agency for the subsequent project. Therefore, this EIR evaluates the Sac State–Placer Center at a~~ programmatic level of detail for educational use. In the event the Board of Trustees of the California State University (CSU) accepts the property on behalf of the State of California, the site would be under the land use and permitting jurisdiction of the CSU, which would relieve Placer County of jurisdictional authority over the site. Specifically, when the transfer is complete, the governing policies of the Placer County General Plan and the PRSP as then adopted will no longer be applicable to the site. Prior to a discretionary action by the CSU requiring consideration under CEQA, the CSU would conduct its own project-specific environmental review. At that time, the university would

ensure compliance with the procedural and substantive requirements of CEQA and in fully addressing potential environmental impacts as required by law. Additional discussion regarding the level of detail of the analysis is provided under the heading “Approach to the Environmental Analysis” in Chapter 4.0, “Affected Environment, Environmental Consequences, and Mitigation Measures.”

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The first paragraph under Section 1.3.2, “Revisions to the Placer Ranch Specific Plan,” on page 1-3 of the Draft EIR is revised as follows:

Since the close of the 30-day period to provide a response to the NOP, County staff have engaged in environmental analysis of the project and continued to coordinate with local agencies with regard to its environmental effects. The County has sought input from several local agencies and entities, including the Cities of Roseville, Rocklin, and Lincoln; Western Placer Waste Management Authority; Placer County Air Pollution Control District; the CSU; and United Auburn Indian Community. Based on input from these agencies and entities, comments received in response to the NOP, early environmental analysis, changing market conditions, and continued, regular coordination with affected agencies and stakeholders, changes to the PRSP land use plan were deemed warranted. The primary changes include increasing the distance between land designated for residential uses and the Western Regional Sanitary Landfill property, increasing the number of low-density residential units, decreasing the number of medium- and high-density residential units, decreasing the General Commercial and Campus Park floor area, decreasing the acreage of open space by 8 acres, and increasing the acreage of parks by 19 acres, such that County General Plan policies for parkland acreage would be met on-site. The net change by land use type is identified in the list below and shown in Table 1-1:

2.1.2 Revisions to Chapter 2, “Executive Summary”

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. To clarify the scope of the NEPA document requirement, the bulleted list of required permits and approvals on page 2-3 of the Draft EIR is revised as follows:

The following approvals and permits are required from other agencies to implement the proposed PRSP:

- ▲ approval of a NEPA document for the PRSP (USACE),
- ▲ Section 404 Individual Permit (USACE),
- ▲ Section 7 Consultation (USFWS and National Marine Fisheries Service),
- ▲ ...

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The bulleted list of required permits and approvals on pages 2-3 and 2-4 of the Draft EIR is revised as follows:

- ▲ Section 1602 Streambed Alteration Agreement (CDFW),
- ▲ amendment of the Wastewater Service Area boundaries (South Placer Wastewater Authority and local agency formation commission), ~~and~~
- ▲ agreement with City of Roseville for outlining fair-share obligations for off-site retention at the Pleasant Grove Retention Facility-, and

▲ approvals and permits through CSU for development of the Sac State–Placer Center.

To provide a minor correction to the Executive Summary table to reflect the correct impact conclusion for Impact 4.1-2 before and after mitigation (which is correctly identified in Section 4.1, “Aesthetics,” of the Draft EIR), Table 2-1 on page 2-7 of the Draft EIR is revised as follows:

Table 2-1 Summary of Impacts and Mitigation Measures				
Impacts		Significance before Mitigation	Mitigation Measures	Significance after Mitigation
NI = No impact	LTS = Less than significant	PS = Potentially significant unavoidable	S = Significant	SU = Significant and
4.1 Aesthetics				
Impact 4.1-2: Substantial degradation of the existing visual character or quality of the site and its surroundings after buildout Implementing the project would maintain or improve visual quality in several parts of the project area. However, in areas where there would be a contrast between rural areas and new development, implementing the project would substantially degrade visual quality. In locations where the visual character is rural or agricultural and the project calls for development rather than preservation of existing conditions, development of the project area would substantially change the visual character of portions of the sites. This impact would be potentially significant.		LTS-PS	No mitigation is required available .	LTS-SU

To correct a typographical error, the second bullet of Mitigation Measure 4.3-2a on page 2-10 of the Draft EIR is revised as follows:

Mitigation Measure 4.3-2a: Implement PCAPCD’s recommended construction mitigation measures (Net SAP Area and PRSP Area)

...

- ▲ The contractor shall submit to the PCAPCD a comprehensive equipment inventory (e.g., make, model, year, emission rating) of all the heavy-duty off-road equipment (50 horsepower ~~of~~ or greater) that will be used in aggregate of 40 or more hours for the construction project. If any new equipment is added after submission of the inventory, the contractor shall contact the PCAPCD before the new equipment being utilized. At least three business days before the use of subject heavy-duty off-road equipment, the project representative shall provide the PCAPCD with the anticipated construction timeline including start date, name, and phone number of the property owner, project manager, and on-site foreman.

To correct a typographical error, the first bullet of Mitigation Measure 4.3-3c on page 2-17 of the Draft EIR is revised as follows:

Mitigation Measure 4.3-3c: Purchase ROG and NO_x offsets through PCAPCD’s Off-Site Mitigation Fee Program (Net SAP Area and PRSP Area)

...

- Establish mitigation off-site within the west Placer County by participating in an off-site mitigation program, coordinated by PCAPCD. Examples include, but are not limited to: participation in a biomass program that provides emissions benefits; retrofitting, repowering, or replacing heavy-duty engines from mobile sources (e.g., buses, construction equipment, on road haulers); or other programs to reduce emissions.

The County has revised Mitigation Measure 4.3-5a on page 2-19 of the Draft EIR, as follows, to address currently planned industrial expansions in the net SAP area and to provide specific measures for residential development that may be proposed near existing/planned industrial development:

Mitigation Measure 4.3-5a: Incorporation of design features at truck loading areas to reduce health-risk exposure at sensitive receptors (Net SAP Area and PRSP Area)

~~Before Design Review approval~~ Prior to Design Review approval and/or issuance of grading permit, ~~project proponents shall design developments~~ new development shall be designed so that truck loading/unloading facilities and sensitive receptors are not located within 1,000 feet of each other ~~existing or planned sensitive receptors~~, if feasible considering site design parameters. ~~Existing or previously approved industrial/commercial development, including any development within boundaries of existing industrial parks, are not subject to this mitigation measure.~~ For the purpose of this mitigation measure, a truck loading/unloading facility is defined as any truck distribution yard, truck loading dock, or truck loading or unloading area where more than one truck with three or more axles will be present for more than 10 minutes per week, on average; and sensitive receptors include residential land uses, campus dormitories and student housing, residential care facilities, hospitals, schools, parks, playgrounds, or daycare facilities. A truck loading/unloading facility and a sensitive receptor can be located within 1,000 feet of each other a sensitive receptor only if a project proponent ~~the project applicant~~ prepares a qualified, site-specific HRA showing that the associated level of cancer risk at the sensitive receptors would not exceed 10 in 1 million. The HRA shall be conducted in accordance with guidance from PCAPCD and shall be approved by PCAPCD. If the HRA determines that a nearby sensitive receptor would be exposed to an incremental increase in cancer risk greater than 10 in 1 million then design measures shall be incorporated to reduce the level of risk exposure to less than 10 in 1 million. Design measures may include but are not limited to the following:

- Implement Mitigation Measure 4.3-3a, which requires all truck loading/unloading facilities to be equipped with one 110/208-volt power outlet for every two-truck loading/unloading facility. A minimum 2-foot-by-3-foot sign shall be clearly visible at each loading dock that indicates, "Diesel engine idling limited to a maximum of 5 minutes." The sign shall include instructions for diesel trucks idling for more than 5 minutes to connect to the 110/208-volt power to run any auxiliary equipment. This measure is recommended in PCAPCD's *CEQA Handbook* (PCAPCD 2017a) and is also consistent with measure VT-1 in the CAPCOA guide (CAPCOA 2010:300–303).
- The use of electric-powered "yard trucks" or fork lifts to move truck trailers around a truck yard or truck loading/unloading facility.
- The use of buildings or walls to shield commercial activity from nearby residences or other sensitive land uses.
- The use of EPA-rated Tier 4 Final engines in diesel-fueled construction equipment when construction activities are adjacent to existing sensitive receptors.
- Plant and maintain a vegetative buffer between the truck loading/unloading facility and nearby sensitive residences, schools, and daycare facilities. As part of detailed site design, a landscape architect licensed by the California Landscape Architects Technical Committee shall identify all locations where trees should be located, accounting for areas where shade is desired such as along pedestrian and bicycle routes, the locations of solar photovoltaic panels, and other infrastructure.

Applicants of residential or commercial development with new sensitive receptors proposed to be located within 1,000 feet of existing and/or planned commercial/industrial facilities that include, or may include, truck loading/unloading facilities, shall prepare an HRA as described above. Design measures identified in the HRA may include but are not limited to the following:

- ▲ Redesign the project to increase the distance between sensitive receptors and potential truck loading/unloading facilities;
- ▲ Use of upgraded filtration systems in the residential HVAC systems;
- ▲ Use of intervening buildings or walls to shield the receptors from the truck loading/unloading facility;
- ▲ Plant and maintain a vegetative buffer between sensitive receptors and the truck loading/unloading facilities. As part of detailed site design, a landscape architect licensed by the California Landscape Architects Technical Committee shall identify all locations where trees should be located, accounting for areas where shade is desired such as along pedestrian and bicycle routes, the locations of solar photovoltaic panels, and other infrastructure.

To clarify mitigation for Impact 4.3-6 (Create objectionable odors affecting a substantial number of people), the following two new mitigation measures are added to page 2-20 of the Draft EIR:

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 is 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.

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.

In response to comment 16-5 and to clarify that the mitigation measure is intended to relocate turtles to equal- or better-quality habitat than the affected habitat and protect eggs and hatchlings as well as adult turtles, Mitigation Measure 4.4-5a on pages 2-29 and 2-30 of the Draft EIR is revised as follows:

Mitigation Measure 4.4-5a: Minimize and avoid disturbances to western pond turtle, burrowing owl, Swainson's hawk, and tricolored blackbird; compensate for loss of occupied habitats (Net SAP Area and PRSP Area)

Western Pond Turtle

Before ground disturbing activities, project proponents shall retain a qualified biologist to determine whether the potential project site contains suitable habitat for western pond turtle. For projects or ground-disturbing activities (including any required off-site improvements) with potential to disturb suitable aquatic or adjacent upland habitat for western pond turtle, the following measures shall be implemented.

- ▲ Within 24 hours before beginning construction activities within ~~200~~ 300 feet of suitable aquatic habitat for western pond turtle, a qualified biologist shall survey areas of anticipated disturbance for the presence of western pond turtle, including eggs and hatchlings. The construction area shall be re-inspected whenever a lapse in construction activity of two weeks or more has occurred. If pond turtles or their eggs are found during the survey or observed within the construction area at any other time, they shall be relocated by a qualified biologist, outside of the area of disturbance, to the nearest area ~~with~~ of suitable aquatic habitat of equal or better quality as the affected habitat. ~~and~~ CDFW will be notified of the discovery and relocation of any western pond turtles.
- ▲ If western pond turtle nests are found in the disturbance area during preconstruction surveys, a 300-foot no disturbance buffer shall be established between the nest and any areas of potential disturbance. Buffers shall be clearly marked with temporary fencing. Construction will not be allowed to commence in the exclusion area until hatchlings have emerged from the nest, or the nest is deemed inactive by a qualified biologist. When hatchlings emerge from the nest, they shall be relocated by a qualified biologist to suitable aquatic habitat outside of the area of disturbance.

To correct a typographical error, the fourth bullet of Mitigation Measure 4.4-7a on page 2-38 of the Draft EIR is revised as follows:

Mitigation Measure 4.4-7a: Avoid or compensate for loss of protected trees (Net SAP Area and PRSP Area)

...

- ▲ The project proponent required to replace lost trees shall provide appropriate irrigation and maintenance to replacement trees and will enter into a maintenance agreement with the County. The project proponent shall post a deposit for the replacement cost of replanted trees to the County and the deposit shall be retained until the County arborist certifies that conditions of the tree permit have been satisfied.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Mitigation Measure 4.4-8c on page 2-39 of the Draft EIR is revised as follows:

Mitigation Measure 4.4-8c: Provide wildlife crossing structures (Net SAP Area and PRSP Area)

The County shall require road crossings over the stream system open space areas to be designed to provide safe wildlife movement using wildlife overpasses, underpasses, bridges, or culverts that are adequately sized to allow safe crossing even during high water. Design of crossings shall be based on

movement requirements for the range of common and sensitive native wildlife species in the region. Where feasible and appropriate, fencing may be used to direct animals toward wildlife crossing structures and away from roadways. For the Sac State–Placer Center site, safe wildlife movement facilities shall be provided as applicable to the Sac State–Placer Center site.

To allow cogeneration as an option for reducing energy use, Mitigation Measure 4.7-2a on pages 2-53 through 2-55 of the Draft EIR is revised as follows:

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

The County will require project proponents of development proposed under the project to incorporate the following measures to reduce operational emissions of GHGs to the extent feasible.

...

Building Energy

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

...

- ▲ 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.

In response to comment 5-2, the discrepancies in the amount of mitigated greenhouse gas (GHG) emissions are addressed, and Mitigation Measure 4.7-2b on pages 2-55 through 2-57 of the Draft EIR is revised as follows:

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

The County will require project proponents of individual developments under the project to offset operational GHG emissions remaining after implementation of Mitigation Measure 4.7-2a. This mitigation measure is consistent with guidance recommended by PCAPCD and CARB (PCAPCD 2017:54, CARB 2017:152). This measure is also consistent with the State CEQA Guidelines, which recommend several options for mitigating GHG emissions. State CEQA Guidelines Section 15126.4(C)(3) states that measures to mitigate the significant effects of GHG emissions may include “off-site measures, including offsets that are not otherwise required....”

Project proponents shall implement an off-site GHG emissions reduction program or to pay GHG offset fees to compensate for the project’s emissions in excess of 1,100 MTCO₂e for a single year, or as determined feasible by the County and project proponent. The off-site program shall comply with approved protocols from California Air Pollution Control Officers Association’s (CAPCOA) GHG Rx program or CARB’s Cap & Trade Offset protocols. Alternatively, the project proponent can purchase local or California-only GHG mitigation credits through the CAPCOA GHG Rx program or ARB accredited offset project registry. At the time this EIR was written, the average rate ranges from \$8 to \$35 per metric ton of CO₂e.

The net SAP area would generate ~~373,896~~ 367,900 MTCO₂e/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~372,795~~ 366,800 MT CO₂e for a period of one year, or 49.13 MTCO₂e/year per thousand square feet of nonresidential development

~~and 27.27 MTCO₂e/year for each residential unit in the net SAP area. Based on the current average rate of \$12 per metric ton of CO₂e, the estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal \$5,120,190 (equivalent to \$0.66 per square foot for nonresidential and \$954 per residential unit).~~

PRSP would generate ~~195,014~~ 195,990 MTCO₂e/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~193,914~~ 194,890 MTCO₂e, or ~~27.14~~ 27.27 MTCO₂e/year for each residential unit in the PRSP area. ~~The estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal \$1,706,730 (equivalent to \$955 per residential unit).~~ Detailed calculations for the Off-Site Mitigation Fee Program can be found in Appendix K.

This condition shall be satisfied prior to the recordation of each Small Lot Final Map or building permit issuance when a small lot map is not required.

PCAPCD and CARB also recommend that lead agencies prioritize direct investments in GHG emission reductions near the project site to provide potential local air quality and economic co-benefits. ~~For example, mPOWER is a local program in Placer County that provides financing to property owners for the installation of energy and water efficiency retrofits and renewable energy systems. Investing in mPOWER is consistent with the County's General Plan Policy 2.G.5, as described above in Section 4.7.3, "Regulatory Setting."~~

~~Other e~~Examples of local direct investments include financing installation of regional electric vehicle-charging stations, paying for electrification of public school buses, and investing in local urban forests. However, it is critical that any such investments in actions to reduce GHG emissions are real and quantifiable, as determined by the County, ~~PCAPCD~~, or a consultant selected by the County.

Where development of a local offset is not feasible, the County will allow project proponents to mitigate GHG emissions through the purchase of ~~local or California-only~~ carbon credits issued through the CAPCOA GHG Rx program or CARB-accredited offset project registry. The purchase of carbon credits shall be prioritized in the following manner: offsite within the SVAB portion of Placer County, within Placer County, or within California.

The GHG reductions achieved through an offset or through the purchase of a carbon credit must meet the following criteria:

- ▲ **Real**—They represent reductions actually achieved (not based on maximum permit levels).
- ▲ **Additional/surplus**—They are not already planned or required by regulation or policy (i.e., not double counted).
- ▲ **Quantifiable**—They are readily accounted for through process information and other reliable data.
- ▲ **Enforceable**—They are acquired through legally binding commitments/agreements.
- ▲ **Validated**—They are verified through the accurate means by a reliable third party.
- ▲ **Permanent**—They will remain as GHG reductions in perpetuity.

The project applicant can satisfy the requirements of this measure by purchasing sufficient carbon credits through the accredited carbon credit registries, investing in a local GHG reduction project/program which complies with the approved protocol from the CAPCOA GHG Rx program or CARB's Cap-and-Trade offset protocols, or paying the calculated mitigation fee based on the carbon credit rate at the time of the recordation of the small lot final map or approval of the first building permit when a small lot map is not required. Demonstration of compliance shall be provided to the County and carbon offset purchases should be verified by a third party. If the mitigation fee is chosen,

the fee should be calculated based on the required GHG reduction and the latest CARB Cap-and-Trade Program Auction Settlement Prices for GHG allowances at the time of the small lot final map recordation or building permit issuance when a small lot map is not required.

~~Establishment of offsets or purchases of carbon credits to offset operational generated GHG emissions should be made prior to recordation of each small lot final map, or approval of the first building permit when a small lot map is not required.~~

To correct a typographical error, Mitigation Measure 4.8-1a on page 2-57 of the Draft EIR is revised as follows:

Mitigation Measure 4.8-1a: Complete a Phase I ESA (Net SAP Area)

A Phase I ESA shall be completed by project proponents of individual projects in the net SAP area. The Phase I ESA shall be performed in general conformance with the scope and limitations of ASTM E 1527-13 "Standard Practice for Environmental Site Assessments" and EPA "Standards and Practices for All Appropriate Inquiries," 40 CFR Part 312. If existing hazardous materials contamination is identified in the Phase I ESA, and the Phase I ESA recommends further review, the project proponent shall retain a Registered Environmental Assessor or other qualified professional to conduct follow-up sampling to characterize the contamination and to identify any required remediation that shall be conducted. These recommendations shall be implemented, and the site shall be deemed remediated by the appropriate agency (DTSC, Placer County Department of Environmental Health Services [PCDEHS]) or Placer County shall issue a No Further Action letter before earth disturbance in the vicinity of the contamination.

To provide a minor clarification, Mitigation Measure 4.8-2 on page 2-60 of the Draft EIR is revised as follows:

Mitigation Measure 4.8-2: Implement measures specified in CCR Title 27 to minimize intrusion of landfill gas into structures (Net SAP Area and PRSP Area)

For any structure sited within 1,000 feet of the WRS property boundary, the following measures specified in CCR Title 27 Section 21190(g) shall be included in the construction drawings ~~and/or blueprints~~ (as applicable) for review and approval by the County Health and Human Services Department:

To provide clarification, Mitigation Measure 4.9-1b on page 2-64 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 if 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,

~~2.3. Demonstrate through the preparation of technical engineering studies, that s~~Stormwater volumetric increases ~~shall be~~ 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.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Mitigation Measure 4.9-5c on page 2-67 of the Draft EIR is revised as follows:

Mitigation Measure 4.9-5c: Prohibit grading within the 100-year floodplain (Net SAP Area and PRSP Area)

No grading activities of any kind may take place within the 100-year floodplain of the stream/drainageway unless approved and analyzed as part of this project. All work shall conform to provisions of the County Flood Damage Prevention Regulations (Section 15.52, Placer County Code). The location of the 100-year floodplain shall be shown on the Improvement Plans.

Prior to Improvement Plan approval and if required by the County Floodplain Administrator, the project proponent shall obtain from FEMA, a Conditional Letter of Map Revision (CLOMR) or Conditional Letter of Map Revision based on Fill (CLOMR-F) for fill within a Special Flood Hazard Area. A copy of the letter shall be provided to the Engineering and Surveying Division prior to approval of Improvement Plans. A Letter of Map Revision (LOMR), or a Letter of Map Revision based on Fill (LOMR-F) from FEMA shall be provided to the Engineering and Surveying Division prior to acceptance of project improvements as complete, or as otherwise approved for the Sac State-Placer Center site.

The County has revised the proposed amendment to the General Plan landfill buffer policy to eliminate the newly proposed allowance of residential uses within 1,000 feet of the landfill with approval of a specific plan, master plan, or development agreement and replace it with a requirement that all new residential development proposed between 1 mile and 2,000 feet of any solid waste disposal site property boundaries requires approval of a specific plan, master plan, or development agreement. To reflect this change, the impact summary for Impact 4.10-2 on page 2-68 of the Draft EIR is revised as follows:

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

The proposed project includes an amendment to the County General Plan Policy 4.G.11, which would reduce the buffer around the WRSL from 1 mile (5,280 feet) to 2,000 feet for residential development, ~~or 1,000 feet~~ with the approval of a specific plan, master plan, or development agreement. This proposed General Plan amendment could result in land use incompatibility due to residential development occurring closer to the WRSL in areas that would otherwise remain undeveloped under the current residential buffer policy. Based on review of existing data regarding nuisance complaints from residents beyond 1 mile, it is expected that new residents and users within the project area would complain about odor from the WRSL and that the number of

complaints lodged about nuisance odors would increase. Such complaints could create pressure for the Western Placer Waste Management Authority (WPWMA) to implement additional odor control and reduction measures at the WRSL and, absent measures to control odors at the source and/or at receptors, could interfere with the ability of the landfill to expand or modify needed operations. Impacts relative to consistency and compatibility of proposed land uses with the WRSL would be potentially significant.

In response to comment 4-50, Mitigation Measure 4.11-4b on page 2-72 of the Draft EIR is revised as follows:

Mitigation Measure 4.11-4b: Reduce exposure to new sensitive land uses from the existing Roseville Power Plant 2 (PRSP Area)

- ▲ Before approval of small-lot tentative maps, the project proponent shall demonstrate that the building occupants of new residential or other sensitive land use within the PRSP area are not exposed to noise levels from the RPP2 that exceed Placer County land use compatibility standards (e.g., 60 dBA L_{dn} /CNEL for residential uses), daytime and nighttime noise limits for sensitive receptors (i.e., 45 dBA L_{eq} /65 dBA L_{max} [night], 55 dBA L_{eq} /70 dBA L_{max} [day]).
- ▲ If achievement of the Placer County noise standards cannot be met by providing adequate setback of at least 590 feet from the RPP2 (i.e., distance at which nighttime L_{eq} standard is met), then the County shall require the developer to construct, at developer's costs, a sound wall between the existing RPP2 and any new sensitive receptors. The sound wall shall be designed by an acoustical engineer and constructed and placed in a manner that achieves, at a minimum, a 5 dB reduction in sound. The wall design shall be coordinated with the City of Roseville. The wall or a combination of wall and setbacks, shall result in achievement of Placer County noise standards.

In response to comment 4-18 and to clarify what type of concrete is required, Mitigation Measure 4.11-5a on pages 2-72 and 2-73 of the Draft EIR is revised as follows:

Mitigation Measure 4.11-5a: Reduce noise levels associated with new, expanded, or extended roads (Net SAP Area and PRSP Area)

Before finalizing roadway design for roadway expansion or new roadway construction, a design-level acoustical study shall be prepared to identify specific roadway design considerations, which shall be incorporated into final road design and approved by Placer County for roadways that result in a substantial increase in noise identified by Tables 4.11-12, 4.11-13, and 4.11-14. Roadway segments outside of Placer County are excluded (Fiddymont Road extension, Foothills Boulevard extension, and Woodcreek Oaks Boulevard extension). The following design features shall be considered:

- ▲ Roadway design shall provide sufficient setback between occupied structures that are defined as sensitive land uses by Placer County (or planned future sensitive land uses) and the roadway to minimize noise exposure to the extent feasible.
- ▲ In locations where setback is not feasible to reduce noise levels at existing or planned future sensitive receptors, roadway design shall incorporate quiet pavement types such as rubberized asphalt concrete (RAC) achieving at least a 4-dB decrease in traffic noise where feasible.
- ▲ Where existing sensitive receptors are located such that neither setback, nor quiet pavement, can reduce traffic noise from new or expanded roads associated with the project, the County shall coordinate with property owners of the existing residences regarding installation of sound walls along property lines to minimize traffic noise to meet exterior noise standards (city or County, as applicable) and, if necessary to meet the 45-dBA interior noise standards, upgrading windows that face the new or extended roadway.

In response to comment 3-15 and to provide additional clarity regarding timing, Mitigation Measure 4.13-1b on pages 2-76 and 2-77 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 is 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.~~

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The impact summary for Impact 4.13-2 on page 2-77 of the Draft EIR is revised as follows:

Impact 4.13-2: Increased demand for law enforcement services

Implementation of the project would allow for the development of more than 2,400 dwelling units in the net SAP area and more than 5,600 dwelling units in the PRSP area. In addition, on-campus housing for students, faculty, and staff may be provided. The increase in the number of residences and jobs in the project area would generate demand for at least 19 additional Placer County Sheriff officers, assuming the Sac State–Placer Center would provide its own law enforcement personnel and facilities. A sheriff's substation is currently planned as part of the Placer Vineyards Specific Plan and would serve the project area and would be designed to accommodate the additional officers generated by the project. Individual residential projects in the SAP area would pay the County Public Facilities Impact Fee toward their fair share of demand for law enforcement facilities in compliance with SAP Policies PFS-7.1 and PFS-7.2 and Placer County General Plan Policy 4.H.4. The Sac State–Placer Center would provide its own law enforcement personnel and facilities. Implementation of the project would increase demand for law enforcement services; because Placer County has policies in place to fund, staff, and maintain adequate law enforcement facilities and services, no adverse effect on such levels of service would occur; however, no specific funding mechanism are in place for the project. Therefore, the impact would be potentially significant.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The impact summary for Impact 4.13-4 on page 2-78 of the Draft EIR is revised as follows:

Impact 4.13-4: Increased demand for library services

Implementation of the SAP would allow for development of more than 2,400 dwelling units, and the PRSP would create more than 5,600 dwelling units. In addition, on-campus housing for students, faculty, and staff may be developed. The increase in the number of residences in the project area would increase demand for library services from County libraries in Rocklin, as well as the nearest City of Roseville library. Individual residential projects in the project area would pay the County Public Facilities Impact Fee toward their fair share of demand for library facilities in compliance with SAP Policies PFS-1.2, PFS-2.1, PFS-2.2, and PFS-2.3 and Placer County General Plan Policies 4.A.2 and 4.A.5. The Sac State–Placer Center would provide its own library services. Because Placer County has policies place to fund, staff, and maintain adequate library facilities and services, no adverse

effect to library services would occur; however, no specific funding mechanism for the project are currently in place. The impact would therefore be potentially significant.

To provide additional interim library service, Mitigation Measure 4.13-4 on page 2-78 of the Draft EIR is revised as follows:

Mitigation Measure 4.13-4: Create or annex into a CFD for library services (Net SAP Area and PRSP Area)

Prior to either the recordation of Final Subdivision Maps or the approval of Improvement Plans, for each property, whichever occurs first, the developer shall create a CFD, CSA Zone of Benefit, annex to an existing CSA Zone of Benefit, or combination thereof, for the purposes of funding supplemental revenue for library facilities, operations, and maintenance. The chosen mechanism shall include a landowner-approved special tax of an adequate amount, or other financing mechanism acceptable to the County, to ensure that a funding mechanism for library services is in place to provide adequate library services to the net SAP area and PRSP area during all stages of development. The County will provide interim library services through one or more means, including usage of the Bookmobile to provide temporary library services, establishment of a satellite library office within SAP or immediately adjacent to, or establishment of a satellite office at 1000 Sunset Boulevard, Rocklin, CA 95677 or other equivalent means beginning at 25 percent buildout of the PRSP or as otherwise determined by the County. These interim library services may become permanent means to provide library services to the plan area if a regional library is not constructed to serve the plan area or a joint partnership with the University has not been agreed to, to provide library services to PRSP before buildout of 75 percent of the DUE's in the plan area or as determined by the County.

To provide a correction, Mitigation Measure 4.14-1a on page 2-80 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-1a: Widen Sunset Boulevard to four lanes from PRSP boundary to Placer Corporate Drive/South Loop Road (Net SAP Area and PRSP Area)

The Placer County Countywide CIP (Placer County 2018c) includes funding for the widening of Sunset Boulevard to four lanes from Cincinnati Avenue to SR 65. Prior to issuance of building permits, project proponents of development projects within the ~~SAP area, including the~~ PRSP area, shall pay the applicable countywide traffic impact fees that are in effect in this area (Sunset District) pursuant to the applicable ordinances and resolutions, which will provide funding towards this improvement. The constructing party shall be eligible for fee credits for the applicable countywide traffic impact fees, as determined by DPWF.

To provide a correction, Mitigation Measure 4.14-1b on page 2-81 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-1b: Construct extension of Foothills Boulevard as a four-lane arterial between PRSP area and its current northern terminus in City of Roseville (Net SAP Area and PRSP Area)

In response to comment 4-73, the second full paragraph of Mitigation Measure 4.14-3 on pages 2-84 and 2-85 of the Draft EIR is revised as follows:

Placer County, in working with the City of Roseville to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Roseville to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Roseville intersections. In reaching an accommodation with the City of Roseville, the County and City, in order to better ensure an effective sub-regional approach to mitigating transportation-related impacts, may

choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that “fair share” fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers, must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County’s transportation network. Any such arrangement(s), with ~~just~~ the City of Roseville or with additional agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels. Placer County shall hold these fees collected for improvements within the City of Roseville in trust for the expressed purpose of funding improvements to the specified facilities within the City.

In response to comment 4-73, the second full paragraph of Mitigation Measure 4.14-4 on pages 2-91 and 2-92 of the Draft EIR is revised as follows:

As with Mitigation Measure 4.14-3, Placer County, in working with the City of Roseville to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Roseville to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Roseville intersections. In reaching an accommodation with the City of Roseville, the County and City, in order to better ensure an effective sub-regional approach to mitigating transportation-related impacts, may choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that “fair share” fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers, must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County’s transportation network. Any such arrangement(s), with ~~just~~ the City of Roseville or with additional agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels. Placer County shall hold these fees collected for improvements within the City of Roseville in trust for the expressed purpose of funding improvements to the specified facilities within the City.

In response to comment 1-3, Mitigation Measure 4.14-10 on page 2-97 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

In response to several comments regarding proposed transportation-related GHG mitigation measures, Mitigation Measure 4.14-13a on pages 2-99 and 2-100 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.

To provide a correction, Mitigation Measure 4.14-15b on pages 2-100 and 2-101 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-15b: Require dedication of right of way to widen Fiddymment Road to six lanes from Athens Avenue to E. Catlett Road (Net SAP Area and PRSP Area)

Prior to Improvement Plan approval or Final Map recordation for subdivision projects, project proponents of individual development projects within the SAP area, ~~including the PRSP area,~~ shall dedicate sufficient right-of-way to widen Fiddymment Road to 6 lanes from Athens Avenue to E. Catlett Road in the future.

To provide a correction, Mitigation Measure 4.14-15c on page 2-101 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-15c: Require dedication of right-of-way to widen Sunset Boulevard to eight lanes from Placer Corporate Drive/South Loop Road to SR 65 (Net SAP Area and PRSP Area)

Prior to Improvement Plan approval or Final Map recordation for subdivision projects, project proponents of individual development projects within the SAP area, ~~including the PRSP area,~~ shall dedicate sufficient right-of-way to widen Sunset Boulevard to 8 lanes from Placer Corporate Drive/South Loop Road to SR 65 in the future. Any development proposed on parcels affected by the future 8 lane facility shall be required as a condition of approval to provide an irrevocable offer of dedication to Placer County for a highway easement to accommodate the future 8 lane roadway improvements.

To provide a minor correction to the amount of wastewater flows that would be generated by buildout of the net SAP area, the impact summary on page 2-110 of the Draft EIR is revised as follows:

Impact 4.15-4: Increased demand for wastewater treatment services

The wastewater flows generated by buildout of the PRSP and net SAP areas are estimated to be 1.99 and ~~3.78~~ 3.8 mgd, respectively, for a combined total of 5.77 mgd ADWF. The PGWWTP currently treats 7.1 mgd ADWF, has an operating treatment capacity of 9.5 mgd ADWF, and is permitted to discharge 12 mgd ADWF in compliance with its NPDES Permit. The plant has available capacity to treat an estimated 2.4 mgd. While wastewater flows from the PRSP area alone could be treated at the PGWWTP, the wastewater collection system would be designed to convey combined buildout flows from both the net SAP and PRSP areas to the PGWWTP. Therefore, any volume beyond that allowed by the PGWWTP's existing NPDES permit would be require additional capacity and a new permit that would identify wastewater treatment requirements. Wastewater flows from the PRSP area would not cause permit limits to be exceeded, but the PGWWTP would not have sufficient capacity to treat the estimated combined wastewater flows from buildout of the net SAP and the PRSP areas. Placer County requires project proponents to obtain written confirmation from SPWA to demonstrate that wastewater treatment services would be provided. While wastewater treatment capacity is sufficient in the nearer term to accommodate buildout of the PRSP area (over approximately 20 years), it is currently insufficient to serve treatment needs from ultimate buildout of the net SAP (over approximately 80 years) and PRSP areas. The project's wastewater flows would require eventual expansion of the PGWWTP. The impact of increased demand for wastewater treatment services would be significant.

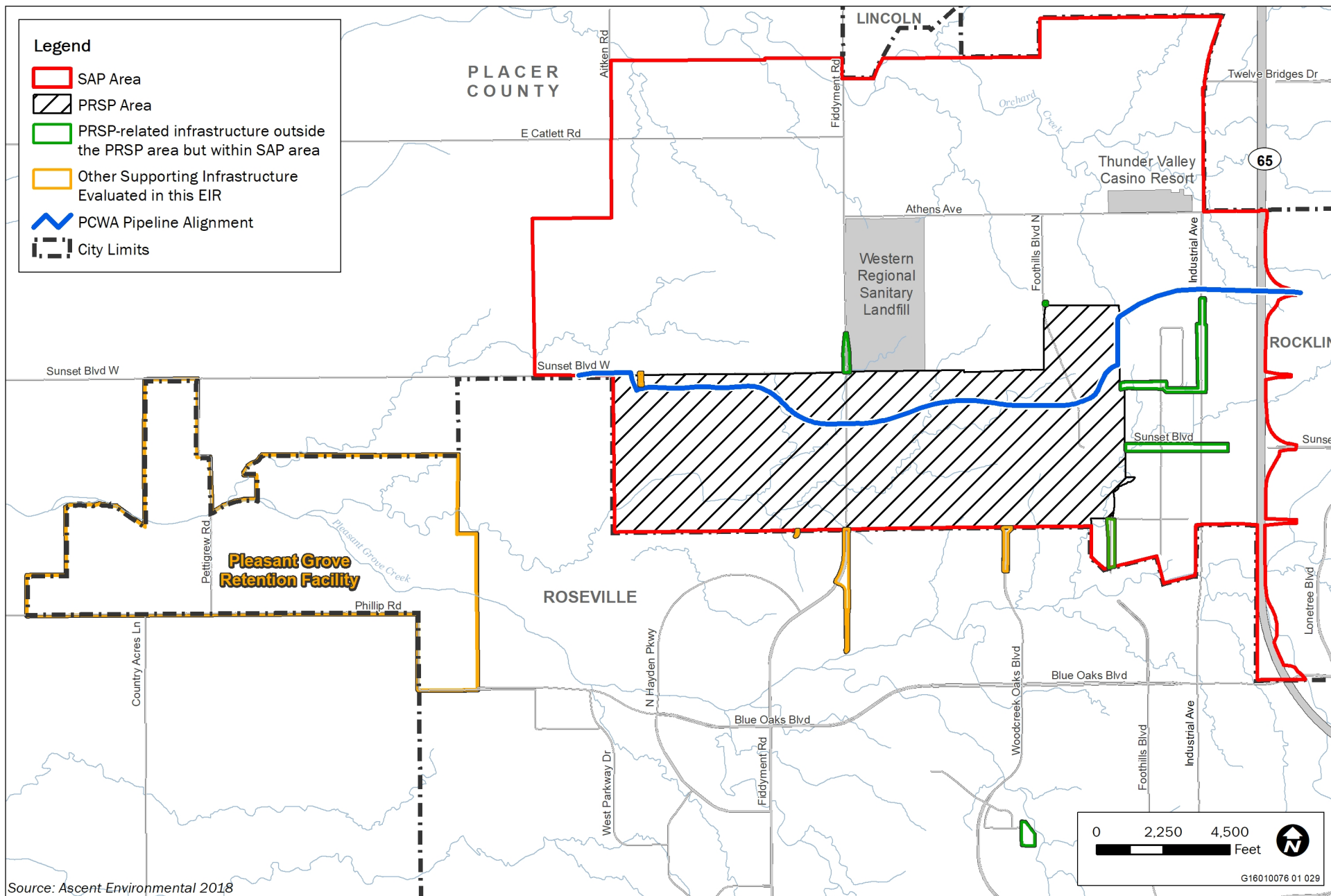
To provide a correction, the impact summary for Impact 4.15-7 on page 2-112 of the Draft EIR is revised as follows:

Impact 4.15-7: Increased demand for electricity

Implementation of the SAP, including the PRSP, would increase demand for electricity by bringing new residential and non-residential electricity users to the area. The increased demand for electricity could require additional electricity generation and transmission facilities, as well as the need for distribution infrastructure. PG&E has existing and planned substations in the SAP area that would have sufficient capacity to serve the new development in the net SAP and PRSP areas. Distribution infrastructure would be installed concurrently with net SAP and PRSP development, thereby reducing potential environmental impacts. Pioneer Community Energy recognizes the additional electric generation service needed to service the increased demand. The impact would be less than significant.

2.1.3 Revisions to Chapter 3, "Project Description"

In response to comment 4-24 and to provide an updated exhibit that reflects the annexation of the Amoruso Ranch Specific Plan into the City of Roseville boundaries, which was approved by the Placer County Local Agency Formation Commission in December 2018, as well as to correct the PCWA pipeline alignment within the PRSP area, Exhibit 3-3 on page 3-4 of the Draft EIR is revised as follows: [see following page]



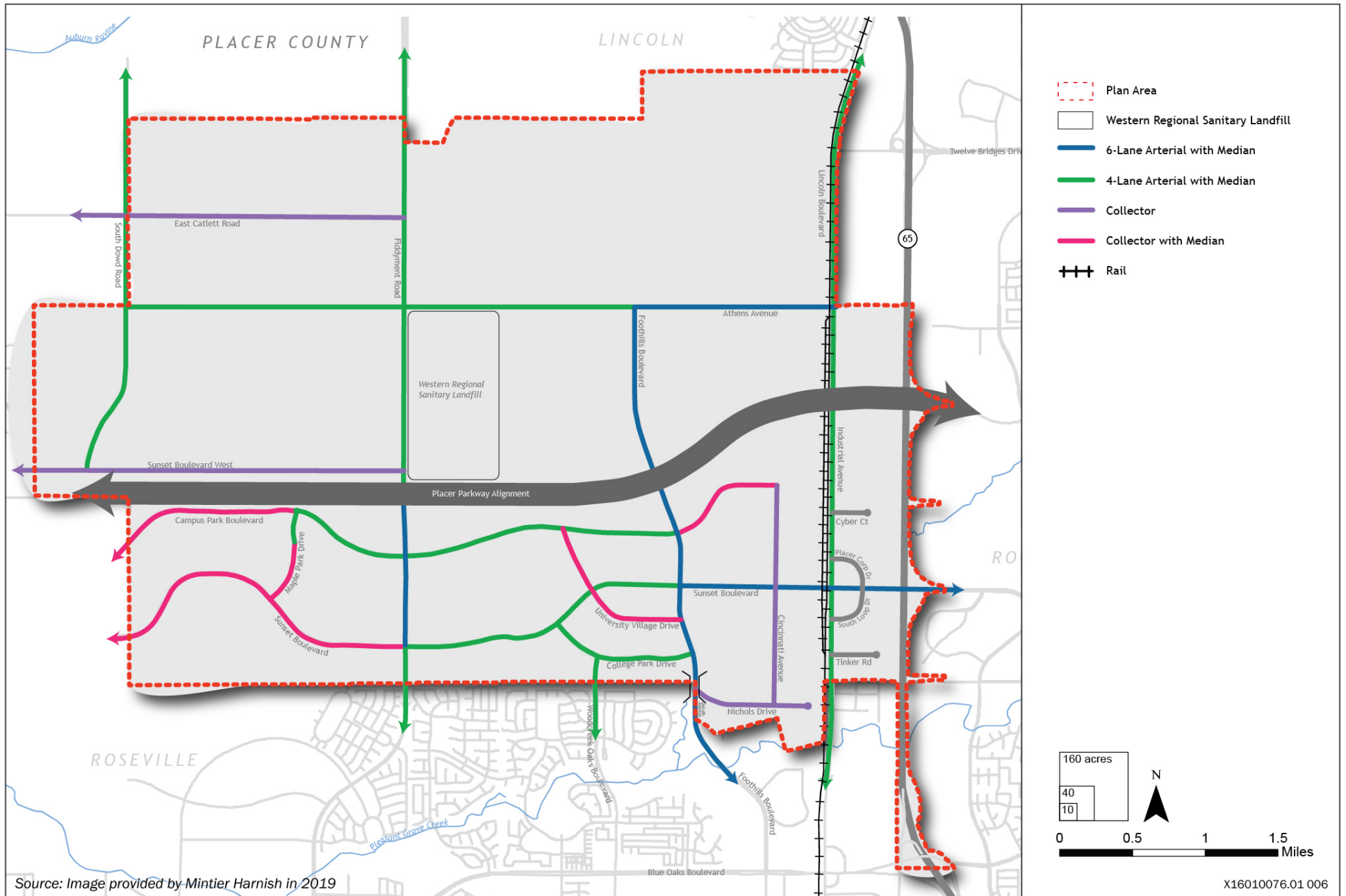
In response to comment 31-8 and to provide a correction to the number of hotel rooms at Thunder Valley Casino Resort, the second paragraph on page 3-5 of the Draft EIR is revised as follows:

There have, however, been some business expansions and new development activity during this time within the plan area. Thunder Valley Casino Resort, located at the intersection of Athens and Industrial Avenues, is the largest new development activity within the plan area since 1997, having expanded to become a full-service casino with a ~~297~~408-room hotel, spa, concert, and gaming facility. Additionally, some core industrial uses have started to take hold in the southeastern corner of the plan area.

To correct a discrepancy and in response to comment 31-9, Table 3-1 on page 3-15 of the Draft EIR is revised as follows:

Table 3-1 SAP Development Density by Land Use Designation				
Land Use Designation	Acres	Floor Area Ratio		Dwelling Units per Acre
		Low	High	
General Commercial	34.2	0.15	0.75	–
Entertainment Mixed-Use	516.8	0.15	1.00 <u>2.00</u>	10-30
Business Park	147.3	0.20	0.50	–
Innovation Center	1,244.7	0.20	0.50	10-30
Eco-Industrial	927.4	0.20	0.60	–
Light Industrial	749.9	0.20	0.50	10-30
Public Facility	6.3	–	–	–
Preserve/Mitigation Reserve	1,943.4	–	0.02	–
Urban Reserve	320.4	–	0.02	–
PRSP	2,213.3	See Table 3-4	See Table 3-4	See Table 3-4
Total	8,103.7			
Source: Information provided by Mintier Hamish in 2017				

To provide a revised circulation diagram for the Sunset Area Plan that reflects the following changes (1) changed University Village Drive in Placer Ranch to be a Collector with Median and (2) added label for Duluth Avenue to show it as the connection between Foothills Boulevard in the Sunset Area and Foothills Boulevard in Roseville, Exhibit 3-7 on page 3-23 of the Draft EIR is revised as follows: [see following page]



In response to comments 4-80 and 4-81 and to provide additional clarity, the second paragraph on page 3-26 of the Draft EIR is revised as follows:

SAP Potable and Recycled Water Systems

The *Sunset Area Water, Wastewater, and Recycled Water Technical Report* was prepared by Psomas in 2017 to evaluate the wet utilities infrastructure needed to serve buildout of the SAP area. (Note that separate master plans were prepared for the PRSP's potable and recycled water systems.) As indicated in this report (included as Appendix B), the Placer County Water Agency (PCWA) is the water wholesaler and retailer for customers within the Sunset Area. The Sunset Area is located within PCWA's lower Zone 6 service area. Recycled water would be provided by PCWA as the retailer with the City of Roseville as the wholesaler providing recycled water from the Dry Creek Wastewater Treatment Plant and Pleasant Grove Wastewater Treatment Plant (PGWWTP). The City of Roseville provides recycled water to customers on a first-come, first-served basis. The City of Roseville would provide the County an opportunity to reserve recycled water supply prior to development under the SAP/PRSP, as considered in the December 2009 South Placer Regional Wastewater Systems Evaluation Final Report. Projected flows and anticipated pipeline diameters and locations are described in detail in the technical study included as Appendix B. Off-site pipeline extensions are identified in Exhibit 3-3 above. The recycled water system would require a reevaluation of the recycled water availability at the time of connection of individual developments. If improvements are needed, they would be funded by those developments.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Table 3-4 on page 3-34 of the Draft is revised as follows:

Table 3-4 PRSP Land Use Designation Summary				
Land Use Designation	Acres	% of Total Acres	Floor Area/ Dwelling Units	% of Total Units
University, Employment, and Commercial Uses				
University (UZ) ¹	301.3	13.6	3,000,000 sq. ft.	–
Campus Park (CP)	335.0	15.1	4,506,282 sq. ft.	–
General Commercial (GC)	22.7	1.0	296,513 sq. ft.	–
Commercial Mixed Use (CMU) ²	48.8	2.2	637,718 sq. ft.	–
Subtotal	707.7	32.0	8,440,513 sq. ft.	–
Residential Uses				
Low Density Residential (LDR)	446.0	20.2	2,210 du	39.2
Low Density Residential – Age-Restricted (LDR-A)	183.1	8.3	1,050 du	18.6
Medium Density Residential (MDR)	112.3	5.1	872 du	15.5
High Density Residential (HDR) ²	60.0	2.7	1,504 du ¹	26.7
Subtotal	801.4	36.2	5,636 du	100.0
Public, Parks, and Open Space Uses				
Public Facilities - Schools (PF)	32.7	1.5	–	–
Public Facilities – County (PF)	10.3	0.5	–	–
Parks and Recreation – Active Parks (PR)	69.8	3.2	–	–
Open Space – Paseos & Preserves (OS)	264.8	12.0	–	–
Subtotal	377.5	17.1	–	–
Other				
Placer Parkway (ROW)	158.5	7.2	–	–
Major Roads/Landscape (HE/LSE)	168.1	7.6	–	–
Subtotal	326.6	14.8	–	–

Total	2,213.3	100.0	8,440,513 sq. ft./ 5,636 du	100.0
Notes: du = dwelling units; sq. ft. = square feet. Some subtotals and totals do not sum precisely because of rounding. ¹ UZ to house up to 5,000 students and 200 faculty ² 300 reserve units are included in the HDR unit total, which are permitted to be allocated to any parcel in the Town Center district, including CMU parcels located outside of the landfill buffer. Source: Information provided by MacKay & Soms in 2018				

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The first sentence on page 3-35 of the Draft EIR is revised as follows:

Exhibit 3-8~~10~~ shows the conceptual campus plan, which illustrates the three general land uses identified for the Sac State–Placer Center. The approximate location of Phase I of the University Development is depicted on Exhibit 3-12:

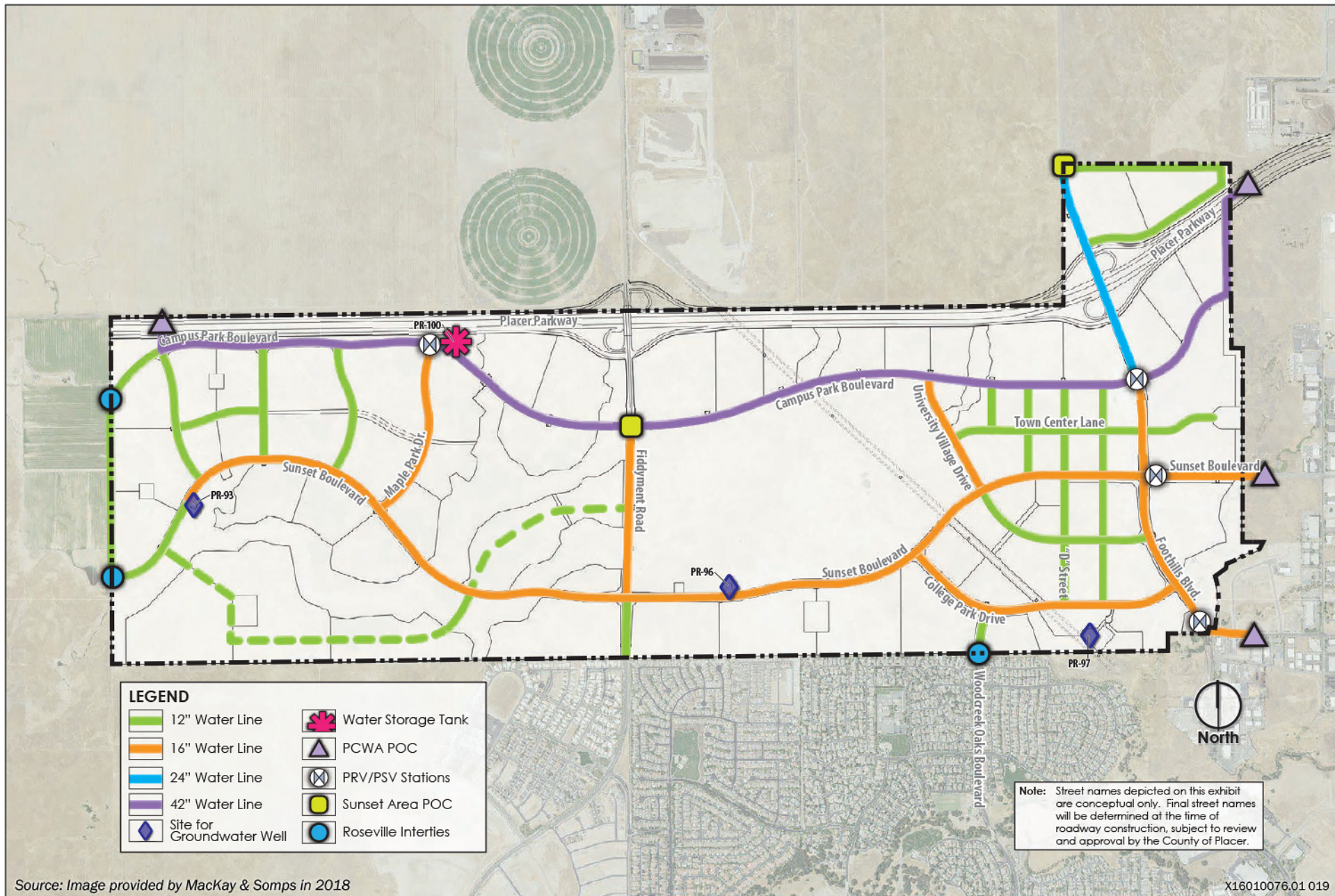
As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The first full paragraph on page 3-39 of the Draft EIR is revised as follows:

Open Space. The OS designation is applied to paseos and preserves. Open space paseos are fully landscaped and function as linear parks, with informal play spaces, sitting areas, and shared-use paths that link parks and schools. Paseos are generally sited within residential neighborhoods. Open space preserves consist of land areas where drainage ways and/or environmentally sensitive habitat is to be preserved in perpetuity. These areas may contain hazards, natural features, or human-made features. Open space areas provide passive recreation opportunities, pedestrian/bike paths, preservation of wetland resources, viewsheds, flood water conveyance and detention, and stormwater quality treatment/filtration features. Although not designated as OS, the University site would include ~~contains~~ approximately 58 acres of open space ~~preserve areas that may function~~ similarly as other preserves in the plan area. The open space preserves within the University site ~~are~~ would be integrated into the system of preserves in the remainder of the plan area and are a significant component of the PRSP's open space network.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Table 3-8 on page 3-43 of the Draft EIR is revised as follows:

Table 3-8 PRSP Student Generation Estimates					
	LDR/MDR Factor¹	HDR/CMU Factor¹	Students Generated	School Capacity	Schools Required
Roseville City School District ²					
Elementary School (Grades K–5)	0.3329	0.1118	1,194	800	1.49
Middle School (Grades 6–8)	0.1164	0.0352	412	1,000	0.41
Roseville Joint Union High School District ²					
High School (Grades 9–12)	0.161	0.036	550	1,800	0.31
Notes: 1. Student generation rates provided by Roseville City School District and Roseville Joint Union High School District. 2. Estimates assume 3,082 LDR/MDR units and 1,504 HDR/CMU units for basis of calculations. Age-restricted <u>and Sac State–Placer Center</u> units not included in total. Source: Information provided by MacKay & Soms in 2018					

In response to comment 7-3 and to provide an updated exhibit that shows the Sunset Area Point of Connection (POC) at the west area and to relabel all PCWA connections as POCs, not interties, Exhibit 3-19 on page 3-52 of the Draft EIR is revised as follows: [see following page]



In response to comment 7-6, the ninth paragraph on page 3-53 of the Draft EIR is revised as follows:

The City of Roseville provides wholesale recycled water to PCWA, which ~~would be anticipated to serve as the recycled water retailer for the PRSP area pending further discussion and agreement with the County.~~ All recycled water improvements would be constructed consistent with PCWA and Placer County standards ~~or City of Roseville standards for those lines located in the City of Roseville.~~ Construction of PRSP recycled water infrastructure would be phased as needed to support development, with specific timing and funding obligations detailed in the *Placer Ranch Development Agreement*. Detailed information about the PRSP recycled water facilities and supplies, including technical analysis, is contained in the *Placer Ranch Recycled Water Master Plan* (Appendix G).

In response to comment 13-1 and to provide clarity regarding drainage, the second paragraph on page 3-58 of the Draft EIR is revised as follows:

Peak stormwater flows between the 2-year, 24-hour and the 100-year, 24-hour storm events would be attenuated within the University Creek corridor using overbank flow areas. These areas coincide with proposed culvert crossings of the creek where crossings could detain flows as needed for flood control. ~~Although the 200-year, 24-hour event would not be attenuated, t~~hese crossings have also been sized to allow this event to be conveyed without overtopping the roadways or flood the adjacent developable areas within the plan area. Portions of the PRSP area that drain to Orchard Creek and the Pleasant Grove Creek North Branch include proposed detention basins that would attenuate flows from the 2-year to the 100-year event.

To reflect a changed project condition (that an easement has been secured since release of the Draft EIR), 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 which includes language allowing 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.

To provide a correction, the fourth paragraph on page 3-61 of the Draft EIR is revised as follows:

Electric Service

~~Electricity transmission and delivery~~ service for the plan area is provided by PG&E, ~~and, Pioneer Community Energy, a community choice aggregator, is the default electric generation service provider, with customers provided the opportunity to opt to PG&E generation service.~~ PG&E would continue to provide ~~electricity transmission and delivery~~ service for development identified in the PRSP, while Pioneer Community Energy would continue to provide electric generation service. At full buildout, the PRSP peak electric demand is estimated to be 80.3 megavolt amperes (MVA). Proposed electric facilities consist of 600-amp mainline backbone feeder circuits extending throughout the major roads, and smaller local circuits extending from the backbone feeder circuits and running through the neighborhoods.

In response to comment 4-33, the last paragraph on page 3-69 of the Draft EIR is revised as follows:

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, including costs associated with property acquisition, environmental review, design construction, operation, and maintenance, 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.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. To clarify the scope of the NEPA document requirement, the bulleted list of required permits and approvals on page 3-73 of the Draft EIR is revised as follows:

The following approvals and permits are required from other agencies to implement the proposed PRSP:

- ▲ approval of a NEPA document for the PRSP (USACE),
- ▲ Section 404 Individual Permit (USACE),
- ▲ Section 7 Consultation (USFWS and National Marine Fisheries Service),

...

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The bulleted list of required permits and approvals on page 3-73 of the Draft EIR is revised as follows:

- ▲ Section 1602 Streambed Alteration Agreement (CDFW),
- ▲ amendment of the Wastewater Service Area boundaries (South Placer Wastewater Authority and local agency formation commission), ~~and~~
- ▲ agreement with City of Roseville for outlining fair-share obligations for off-site retention at the Pleasant Grove Retention Facility, and
- ▲ approvals and permits through CSU for development of the Sac State–Placer Center.

In response to comment 31-13 and to show the location of the SAP proposed sanitary landfill buffers, the first sentence on page 3-74 of the Draft EIR has been revised as follows: [see following page]

PROPOSED REVISIONS TO BUFFER LIMIT

Table 1-5 and Goal 4.G of the *Placer County General Plan* would be revised as follows (see Exhibit 3-27):

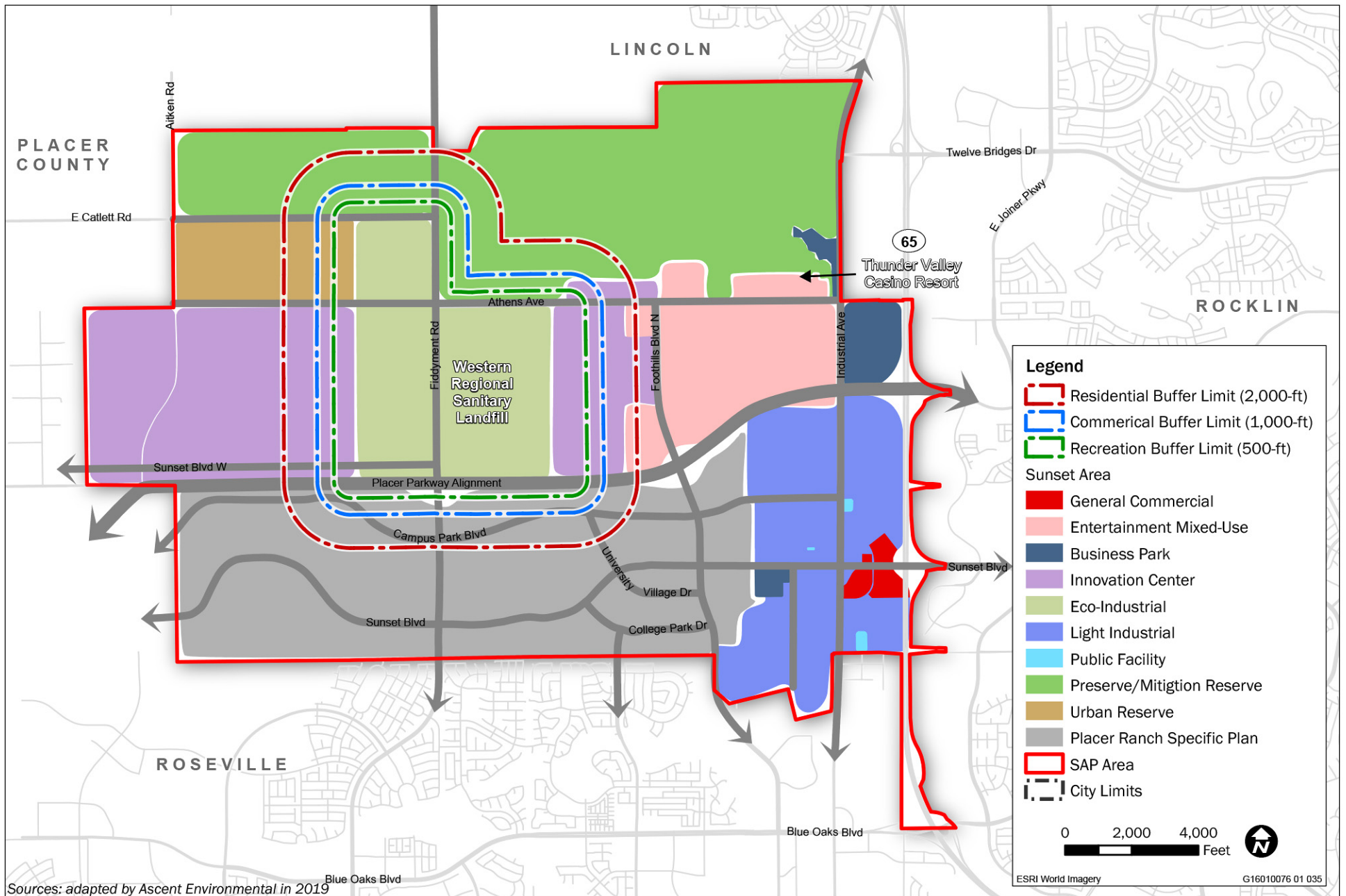


Exhibit 3-27

Proposed Land Use Buffers

The County has revised the proposed amendment to the General Plan landfill buffer policy to eliminate the newly proposed allowance of residential uses within 1,000 feet of the landfill with approval of a specific plan, master plan, or development agreement and replace it with a requirement that all new residential development proposed between 1 mile and 2,000 feet of any solid waste disposal site property boundaries requires approval of a specific plan, master plan, or development agreement. The following revision is therefore made to note 5 at the bottom of Table 1-5 [from the County General Plan] as shown on page 3-74 of the Draft EIR:

Placer County General Plan Table 1-5		Minimum Public Facility Buffer Zone Standards Width		
Type of Public Facility	Minimum Buffer Zone Width (feet) by Land Use Designation Type			
	Residential	Commercial	Industrial	Recreation
Airport ¹	2,000	1,000 ²	0	0 - 500 ³
Sewage treatment plant	1,000	1,000	0 - 500 ⁴	1,000
Solid waste transfer station	500	0	0	500
Solid waste disposal site	5,280 2,000 ⁵	1,000 ⁶	0	500 ⁶

1. See also comprehensive land use plans (CLUPs) for airports.

2. Buffer required for non-airport related commercial uses only.

3. No separation necessary for expansive, low-population outdoor recreation facilities such as golf courses; 500 feet for places of public assembly, outside of aircraft overflight areas.

4. No separation necessary for warehousing uses with a low employee-per-square foot ratio; 500 feet required for manufacturing facilities and business parks.

5. Policy 4.G.11 protects landfill facilities from future residential encroachment by requiring a residential buffer of one mile 2,000 feet measured from the property line of an active or future landfill site. Residential uses may be considered on a case-by-case basis to be as close as 1,000 feet with approval of a specific plan, master plan, or development agreement. All new residential development proposed between 1 mile and 2,000 feet of any solid waste disposal site property boundaries requires approval of a specific plan, master plan, or development agreement. See Placer County Sunset Area Plan for specific standards related to residential uses proposed within 1 mile and 2,000 feet of the Western Placer Regional Landfill.

6. Commercial and recreation uses within the specified buffer zones may be considered on a case-by-case basis with approval of a specific plan, master plan, or development agreement.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The last paragraph on page 3-77 of the Draft EIR is revised as follows:

Any future development projects within the Sunset Area would be subject to the standards in the *Sunset Area Plan Implementing Zoning Regulations* and the *Placer County Zoning Ordinance*, and, accordingly, all development projects would require review and approval of subsequent permits and entitlements by Placer County as set forth therein (e.g., subdivision review, design review, conditional use permits, variances, and/or other permits). As discussed in Chapter 1, "Introduction," once the Sac State–Placer Center property is accepted by the Board of Trustees of the CSU, Placer County would no longer have jurisdictional authority over the site.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The fourth paragraph on page 3-78 of the Draft EIR is revised as follows:

Environmental Review

All applications for development entitlement for projects within the plan area that are submitted after approval of the SAP and PRSP would be required to be reviewed for conformity with the SAP and (as applicable) the PRSP, excluding development of the Sac State–Placer Center property if owned by the Board of Trustees of the CSU. These development entitlements would also require review for compliance with CEQA, Public Resources Code Section 21000 et seq. This EIR is intended to serve as the base environmental document for subsequent entitlement approvals within the plan area. As discussed in Chapter 1, "Introduction," this EIR evaluates the Sac State–Placer Center at a programmatic level of detail and CSU would conduct its own project-specific environmental review of

development of the site. It should be noted that under Section 65457(a) of the California Government Code and State CEQA Guidelines Section 15182, any residential development project, including any subdivision, that is undertaken to implement and is consistent with a specific plan is exempt from additional CEQA review.

2.1.4 Revisions to Section 4.0, “Approach to the Environmental Analysis”

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The second paragraph on page 4-2 of the Draft EIR is revised as follows:

As a state entity, the CSU is not required to obtain development approvals from Placer County or other local agencies and would serve as its own lead agency pursuant to CEQA and would administer campus project permitting. While this EIR provides substantial analysis of the university campus based on the information available (i.e., conceptual campus plan, land use and facility types, approximate floor area, and approximate student and employee numbers), the university has yet to develop a master plan for the campus, which would detail its strategic vision; design goals, recommendations, and strategies for the physical elements of the campus; a land and building program, which would describe building types, locations, and sizes necessary to support the university’s functions and projected enrollment; and other details, including parking, energy and sustainability, site-specific infrastructure, support facilities, and the like. Therefore, this EIR analyzes the Sac State–Placer Center portion of the PRSP at a program level. This EIR can provide CEQA tiering opportunities to the state, and the university—will need to assess its proposed project -at such time those details are developed- in light of the information in this EIR, determine the degree to which its actions are covered, summarize or incorporate by reference relevant portions of this EIR, and evaluate environmental effects that were not sufficiently addressed by the program-level analysis. A master plan would be required for university development at this location.

2.1.5 Revisions to Section 4.1, “Aesthetics”

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The third full paragraph on page 4.1-26 of the Draft EIR is revised as follows:

Conclusion

Existing General Plan policies and proposed policies and design guidelines would emphasize use of less-reflective surfaces and orientation of buildings, as well as other lighting requirements, to limit the adverse effects associated with the creation of new sources of substantial glare. Although lighting would be minimized to the extent possible as a result of existing and proposed General Plan policies, including the directional requirements, capping of light standards, and minimizing spillover, the sheer quantity of lighting would create a new source of light pollution related to the substantial source of light across the project area. It should be noted that County policies would not apply to the Sac State–Placer Center, which would be a substantial source of nighttime lighting, including a stadium. As a result, nighttime lighting impacts would be potentially significant. No feasible mitigation, beyond the policies and design measures, would be available to prevent the cumulative effect of light across the entire project area. Therefore, the impact related to nighttime lighting would be **significant and unavoidable.**

2.1.6 Revisions to Section 4.2, “Agricultural Resources”

No revisions are needed.

2.1.7 Revisions to Section 4.3, “Air Quality”

REVISIONS RESULTING FROM THE “*FRIANT RANCH*” DECISION

On December 24, 2018, during the public review period of the SAP/PRSP Draft EIR, the California Supreme Court published decision S219783, *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 (herein referred to as the Friant Ranch Decision), which overturned the County of Fresno’s approval of the Friant Community Plan Update and Friant Ranch Specific Plan EIR, confirming some of the findings of the 5th District Court of Appeal’s decision (226 Cal.App.4th 704). The decision addressed, in part, the EIR’s air quality analysis and approach to disclosing a potential connection to human health impacts.

Consistent with standard CEQA practice and as recommended by the San Joaquin Valley Air Pollution Control District (SJVAPCD), the Friant Ranch EIR estimated emissions of criteria pollutants and ozone precursors in tons per year and compared these to the applicable mass emissions thresholds of significance as developed by SJVAPCD. Emissions of reactive organic gases (ROG) and oxides of nitrogen (NO_x) (which combine in the atmosphere to form ground-level ozone, a criteria air pollutant), as well as respirable particulate matter (PM₁₀), exceeded the SJVAPCD’s thresholds of significance for these pollutants. As a result, project-related air quality impacts were determined to be potentially significant. Following the application of all feasible mitigation measures, air quality impacts were still found to be potentially significant and unavoidable.

The Court found that the air quality analysis lacked sufficient detail to enable readers to fully understand the nature and magnitude of impacts. It also failed to make a reasonable effort to connect the project’s air quality impacts to human health effects or explain why such a connection was not feasible. The Court expressed that it is not an adequate analysis under CEQA to simply produce quantitative estimates of air pollutants and disclose that such estimates would result in a significant impact when compared to the state and federal standards; therefore, CEQA practitioners should make a good faith effort to explain why a certain level of air pollution within a specific air basin would be called significant and should describe the meaning of a significant impact to the reader in meaningful terms, such as the locations and receptors affected and potential health implications, if possible.

In light of this recent Supreme Court case, County staff has initiated the following changes to Section 4.3, “Air Quality,” to provide clarity regarding the relationship between emission of criteria air pollutants and public health effects.

The following new text is added to page 4.3-14 of the Draft EIR following the discussion of Toxic Air Contaminants and prior to the heading “Compostable Materials Handling Operations and Facilities”:

Sierra Club v. County of Fresno

In December 2018, the California Supreme Court issued its decision in *Sierra Club v. County of Fresno* (2018) (6 Cal.5th 502). The case reviewed the long-term, regional air quality analysis contained in the EIR for the proposed Friant Ranch development. The project is located in unincorporated Fresno County within the San Joaquin Valley Air Basin, an air basin currently in nonattainment for multiple NAAQS and CAAQS, including ozone and PM. The Court ruled that the air quality analysis failed to adequately disclose the nature and magnitude of long-term air quality impacts from emissions of criteria pollutants and precursors “in sufficient detail to enable those who did not participate in its preparation to understand and consider meaningfully the issues the proposed project raises.” The Court noted that the air quality analysis did not provide a discussion of the foreseeable adverse effects of project-generated emissions on Fresno County’s likelihood of exceeding the NAAQS and CAAQS for criteria air pollutants nor did it explain why it was not “scientifically possible” to determine such a connection. The Court concluded that “because the EIR as written makes it impossible for the public to translate the bare numbers provided into adverse health impacts or to understand why such translation is not possible at this time,” the EIR’s discussion of air quality impacts was inadequate.

To clarify that PCAPCD's thresholds are ultimately tied to public health, pages 4.3-20 and 4.3-21 of the Draft EIR are revised as follows:

STANDARDS OF SIGNIFICANCE

Based on the Placer County CEQA checklist and Appendix G of the State CEQA Guidelines, a project would result in a potentially significant impact on air quality if it would:

- ▲ conflict with or obstruct implementation of the applicable air quality plan;
- ▲ violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- ▲ result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is in nonattainment under any applicable NAAQS or CAAQS (including releasing emissions that exceed mass emission level standards for ozone precursors);
- ▲ expose sensitive receptors to substantial pollutant concentrations (including TACs); or
- ▲ create objectionable odors affecting a substantial number of people.

As stated in Appendix G of the State CEQA Guidelines, the significance criteria established by the applicable air district, in this instance PCAPCD, may be relied upon to make the above determinations. PCAPCD has developed guidance for use by lead agencies when preparing CEQA documents (PCAPCD 2017a). PCAPCD has adopted CEQA thresholds of significance for evaluating impacts to air quality. CEQA-related air quality thresholds of significance are tied to achieving or maintaining attainment designations with the NAAQS and CAAQS, which are scientifically substantiated, numerical concentrations of criteria air pollutants considered to be protective of human health. PCAPCD significance criteria are substantially similar to those of Appendix G, but with some additional specificity.

PCAPCD identified numerical thresholds for project-generated emissions of criteria air pollutants and precursors that would determine whether a project's discrete emissions would result in a cumulative, regional contribution (i.e., significant) to the baseline nonattainment status of the air basin. PCAPCD's quantitative thresholds of significance for project-level CEQA evaluation are used to determine the extent to which a project's emissions of criteria air pollutants and precursors would contribute to regional degradation of ambient air quality within the air basin. In its CEQA Thresholds of Significance Justification Report, PCAPCD indicates that development of its mass emissions thresholds considered (PCAPCD 2016:5):

- ▲ The current emission offset requirement required by PCAPCD's new source review rule.
- ▲ The regional goal to attain the NAAQS and CAAQS.
- ▲ The historical CEQA projects reviewed by PCAPCD from 2003 to 2015.
- ▲ The CEQA significance thresholds adopted by other air districts in the Sacramento Area.

As a nonattainment area under the NAAQS and CAAQS, PCAPCD must prepare a SIP, which serves as a comprehensive plan that describes how state and local measures will attain air quality standards. Within the SIP, PCAPCD develops an emissions inventory for nonattainment areas to determine to what extent various sources within the area are responsible for emissions of criteria pollutants and ozone precursors. Baseline emissions are established, and a trajectory to attainment based on expected growth rate of population, housing, industrial/commercial activity, energy use, and motor vehicle travel is developed (PCAPCD 2016:7).

PCAPCD's mass emissions CEQA thresholds represent a portion of land use emissions budgeted for in the SIP. Based on the above considerations, PCAPCD has determined that projects that emit

criteria air pollutants and ozone precursors below these thresholds would not impede PCAPCD's capacity to attain the NAAQS and CAAQS under the emissions inventory found in the SIP. As discussed in Sections 4.3.2, "Environmental Setting," and 4.3.3, "Regulatory Setting," the NAAQS and CAAQS were developed in consideration of extensive scientific and economic review and represent concentrations of criteria air pollutants that provide public health protection, including protecting the health of sensitive populations such as asthmatics, children, and the elderly.

As such, for the purpose of this analysis, the following thresholds of significance are used to determine if project-generated emissions would produce a considerable level of air pollutants that would impede PCAPCD's capacity to attain the NAAQS and CAAQS at the regional level and/or result in localized air quality impacts. For the reasons discussed above, if the project would generate emissions below these thresholds, the project's contribution of air pollutants would not inhibit PCAPCD achieving attainment under the NAAQS and CAAQS; thus the potential for an adverse human health impact would be avoided. As identified by PCAPCD, an air quality impact is considered significant if implementation of the project would result in (PCAPCD 2017a):

- ▲ construction-generated criteria air pollutant or precursor emissions that would exceed the PCAPCD-recommended threshold of 82 pounds per day (lb/day) for ROG, NO_x, or PM₁₀ (PCAPCD 2017a:21), or operation-related (regional) emissions of ROG or NO_x that exceed a mass emission threshold of 55 lb/day, and emissions of PM₁₀ that exceed 82 lb/day. While PCAPCD has not established a mass emission threshold for PM_{2.5}, which is a subset of PM₁₀, this analysis considers project-generated emissions of PM_{2.5} to be significant if PCAPCD's thresholds for PM₁₀ are exceeded (PCAPCD 2017a:21);
- ▲ long-term operational local mobile-source CO emissions that would result in an exceedance of the NAAQS and CAAQS for CO (PCAPCD 2017a:21);
- ▲ exposure of sensitive receptors to TAC emissions, from a single source, that would exceed 10 in 1 million for the carcinogenic risk (i.e., the risk of contracting cancer) or a noncarcinogenic Hazard Index of 1 for the maximally exposed individual (PCAPCD 2017a:58–62); or
- ▲ creation of an objectionable odor affecting a substantial number of people.

Page 4.3-23 of the Draft EIR is revised as follows:

Health Risk Toxic Air Contaminants

Health risks from project-generated construction- and operational-related emissions of TACs were assessed qualitatively. This assessment is based on the location from which construction- or operational-related TAC emissions would be generated by land uses developed under the project relative to nearby sensitive receptors as construction occurs, as well as the duration of TAC exposure.

Page 4.3-28 of the Draft EIR is revised as follows:

Net SAP Area

Construction of land uses under the net SAP could begin as early as 2021 and last approximately 80 years. The emission estimates presented in Table 4.3-5 assume construction would take place at a consistent pace over an 80-year period. Ultimately, however, construction phasing would be driven by market conditions in any given year. Thus, the level of construction activity and associated emissions would likely be higher some years than in others. As construction continues in the future, equipment exhaust emission rates would decrease as newer, more emission-efficient construction equipment replaces older, less efficient equipment. For specific assumptions and modeling inputs, refer to Appendix K.

Table 4.3-5 summarizes the modeled maximum daily emissions from the construction activities for the net SAP area in 10-year increments. The table shows how emissions are expected to decrease as the fleet of older construction equipment is replaced by a newer, more emission-efficient fleet. However, emission reductions are only known through the year 2050, as the effect of existing regulation extends until that time. Thus, emission modeling ends at 2050 for the purposes of this analysis, even though buildout of the net SAP is expected to extend beyond 2050.

As shown in Table 4.3-5, if construction were to occur at a consistent pace during an 80-year buildout period, maximum daily emissions of ROG, NO_x, or PM₁₀ would not exceed applicable thresholds through the anticipated buildout period. However, the amount of new construction that would occur under the net SAP would vary from year to year based on market conditions. There could be no new construction during some years and a boom in construction during other years. During boom periods, the level of construction activity could generate daily emission levels of ROG and NO_x substantially higher than the levels show in Table 4.3-5 that exceed PCAPCD's threshold of 82 lb/day. For instance, if six times the average rate of construction took place during the same period, then associated emissions of ROG would exceed PCAPCD's threshold of 82 lb/day. Similarly, if two times the average rate of construction took place during the same period, then associated emissions of NO_x could exceed PCAPCD's threshold of 82 lb/day. Moreover, the mass emission threshold for PM₁₀ would be exceeded if five times the average rate of construction took place during the same period. Thus, there may be periods during the buildout of the net SAP area when construction-related emissions of ozone precursors, ROG and NO_x, as well as emissions of PM₁₀ would exceed PCAPCD's recommended thresholds and thereby contribute to the existing nonattainment status of the SVAB with respect to the CAAQS and NAAQS for ozone, PM₁₀, and PM_{2.5}.

The addition of NO_x, which is a precursor to ozone, could result in an increase in ambient concentrations of ozone in the air basin and, moreover, increase the likelihood that ambient concentrations exceed the CAAQS and NAAQS. As summarized in "Environmental Setting," above, human exposure to ozone may cause acute and chronic health impacts including coughing, pulmonary distress, lung inflammation, shortness of breath, and permanent lung impairment. Also, the increase in construction-generated emissions of PM₁₀ could impede air quality planning efforts to bring the air basin into attainment of the CAAQS for PM₁₀. However, it would be misleading to correlate the levels of criteria air pollutant and precursor emissions associated with development within the net SAP area to specific health outcomes to sensitive receptors. While the description of effects noted above could manifest in exposed receptors, actual effects on individuals depend on individual factors, such as life stage (e.g., infants, adolescents, and the elderly are more sensitive), preexisting cardiovascular or respiratory diseases, lifestyle choices, and genetic polymorphisms. Even if this type of specific medical information, which is confidential to the individual, were available, there are wide ranges of potential outcomes from exposure to ozone precursors and particulates, from no effect to the effects described above. Therefore, other than determining the general types of health effects that could occur, it would be speculative to more specifically correlate exposure to criteria pollutants and precursors from this project to the degree and locations of specific health outcomes to receptors. By evaluating emissions of air pollutants against PCAPCD's thresholds, it is foreseeable that health complications associated with ozone and PM₁₀ exposure could be exacerbated to nearby sensitive receptors by construction-generated emissions. Because construction-generated emissions would exceed PCAPCD's mass emissions thresholds, the project would contribute a substantial level of emissions that could impede PCAPCD's capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. This impact would be significant.

Page 4.3-30 of the Draft EIR is revised as follows:

As shown in Table 4.3-5, maximum daily emissions of ROG, NO_x, and PM₁₀ could potentially exceed applicable thresholds during various years of the estimated 18-year buildout period. Based on the assumptions used in the modeling maximum daily emissions of ROG, NO_x, and PM₁₀ could be as

high as 131 lb/day, 280 lb/day, and 138 lb/day, respectively. Thus, there would be periods during the buildout of the SAP area when construction-related emissions of ozone precursors, ROG and NO_x, as well as emissions of PM₁₀ would exceed PCAPCD's recommended thresholds and thereby contribute to the existing nonattainment status of the SVAB with respect to the CAAQS and NAAQS for ozone, PM₁₀, and PM_{2.5}. For the same reasons described above under "Net SAP Area," this exceedance would contribute a substantial level of emissions that could impede PCAPCD's capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. This impact would be significant.

Other Supporting Infrastructure

Pleasant Grove Retention Facility

Construction of the South Basin of the Pleasant Grove Retention Facility was assumed to begin in 2021 and conservatively estimated to be complete in 5 years. Construction of the 10-acre North Basin of the Pleasant Grove Retention Facility was assumed to begin in 2026 and also estimated to take 5 years. Construction of both retention basins would involve the excavation and movement of 1,251,900 cubic yards of earthen material from 93 acres of the basin area to 154 acres of upland area on the site. This would be a more intense level of earth movement and associated heavy-duty, off-road equipment than the grading phases of land uses developed under the project. For specific assumptions and modeling inputs, refer to Appendix K.

As shown in Table 4.3-5, maximum daily emissions of ROG and PM₁₀ would not exceed applicable thresholds during the construction of the Pleasant Grove Retention Facility. However, NO_x emissions generated during construction of these facilities would exceed the PCAPCD-recommended threshold. Based on the assumptions used in the modeling maximum daily emissions of NO_x could be as high as 184 lb/day, and thereby contribute to the existing nonattainment status of the SVAB with respect to the CAAQS and NAAQS for ozone. For the same reasons described above under "Net SAP Area," this exceedance would contribute a substantial level of emissions that could impeded PCAPCD's capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. This impact would be significant.

Off-Site Transportation and Utility Improvements

It was assumed that construction of off-site transportation and utility improvements would begin in 2021 and each improvement would be completed in approximately 6 months; except the bridge connection on Foothills Boulevard South, which would be completed in 12 months. Reported emissions represent a conservative estimate of maximum daily emissions because all improvements were expected to be constructed simultaneously. However, actual construction phasing of off-site improvements is unknown at this time. For specific assumptions and modeling inputs, refer to Appendix K.

As shown in Table 4.3-5, maximum daily emissions of ROG and PM₁₀ would not exceed applicable thresholds throughout the buildout period. However, NO_x emissions associated with construction of the bridge connection on Foothills Boulevard South would exceed the PCAPCD-recommended threshold of 82 lb/day. Based on the assumptions used in the modeling maximum daily emissions of NO_x could be as high as 159 lb/day and thereby contribute to the existing nonattainment status of the SVAB with respect to the CAAQS and NAAQS for ozone. For the same reasons described above under "Net SAP Area," this exceedance would contribute a substantial level of emissions that could impeded PCAPCD's capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. This impact would be significant.

Conclusion

Construction emissions associated with the net SAP, PRSP, Pleasant Grove Retention Facility, and the off-site transportation and utility improvements would exceed applicable thresholds for ROG, NO_x, and PM₁₀, and thus contribute to the existing nonattainment status of the SVAB with respect to the CAAQS and/or NAAQS for ozone, PM₁₀, and PM_{2.5}. For the same reasons described above under

“Net SAP Area,” this exceedance would contribute a substantial level of emissions that could impede PCAPCD’s capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. This impact would be **significant**.

Page 4.3-33 of the Draft EIR is revised as follows:

In summary, because of the scale and extent of construction activities that would occur, as well as the uncertainty of specific construction activities and timing, construction activities could overlap, resulting in emissions that exceed PCAPCD’s daily construction thresholds and contribute further to the nonattainment status of the SVAB and potential adverse human health effects to receptors exposed to such concentrations. This impact would remain **significant and unavoidable**.

Page 4.3-35 of the Draft EIR is revised as follows:

Net SAP Area

Table 4.3-7 summarizes the maximum daily operation-related emissions of criteria air pollutants and precursors at full buildout of the net SAP area. As shown in Table 4.3-7, operational activities would result in project-generated emissions of ROG, NO_x, and PM₁₀ that exceed the PCAPCD-recommended thresholds of significance. For the same reasons described above under Impact 4.3-2, this exceedance would contribute a substantial level of emissions that could impede PCAPCD’s capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. This would be a significant impact.

Page 4.3-36 of the Draft EIR is revised as follows:

PRSP Area

Table 4.3-8 summarizes the maximum daily operation-related emissions of criteria air pollutants and precursors at full buildout of the PRSP area. As shown in Table 4.3-8, operational activities would result in project-generated emissions of ROG, NO_x, and PM₁₀ that exceed the PCAPCD-recommended thresholds of significance. For the same reasons described above under Impact 4.3-2, this exceedance would contribute a substantial level of emissions that could impeded PCAPCD’s capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. This would be a significant impact.

Page 4.3-36 of the Draft EIR is revised as follows:

Conclusion

As shown in Tables 4.3-7 and 4.3-8 above, NO_x, PM₁₀, and PM_{2.5} emissions associated with the operation of land uses developed under the project would exceed applicable mass emission thresholds recommended by PCAPCD. For this reason, these emissions could contribute substantially to the nonattainment status of SVAB with respect to the NAAQS and CAAQS for ozone, CAAQS for PM₁₀, and NAAQS for PM_{2.5}. (This would be the case even though no direct emissions would be associated with operation of the Pleasant Grove Retention Facility and the off-site transportation and utility improvements.) For the same reasons described above under Impact 4.3-2, this exceedance would contribute a substantial level of emissions that could impede PCAPCD’s capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. This impact would be **significant**.

Page 4.3-41 of the Draft EIR is revised as follows:

Nonetheless, the operational emissions of some projects developed under the net SAP and PRSP would not individually generate emissions of ROG and/or NO_x that exceed PCAPCD’s operational threshold of 55 lb/day but, as shown in this analysis, the combined level of operational emissions of ROG and/or NO_x associated with multiple developments would exceed PCAPCD’s threshold. Because participation in a verified PM₁₀ offset program cannot be assured, operational emissions of some

projects developed under the net SAP and PRSP could exceed the PCAPCD threshold of significance. For the same reasons described above under Impact 4.3-2, this exceedance would contribute a substantial level of emissions that could impeded PCAPCD's capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. No additional feasible mitigation measures are available to reduce this impact, and this impact would be **significant and unavoidable**.

REVISIONS RELATED TO LANDFILL AND ODORS

In response to comments received by the Western Placer Waste Management Authority (WPWMA) and others, the County has revised the Draft EIR to include mitigation that identifies and prioritizes the odor improvement measures identified by WPWMA, many of which are also described in the Draft EIR and in comment letters. The Draft EIR has also been revised to explain that although a fee program does not currently exist to implement the WPWMA-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 capital investments and ongoing operation and maintenance to create a bona fide fee program. In advance of such a program, the County is requiring the PRSP project proponents to make a monetary contribution, based on a reasonable, fact-based method, to WPWMA to reduce odor impacts and, upon development of a fee program by WPWMA, will require other proponents of projects within the net SAP area to contribute in accordance with established methodologies. See Master Response 4: Odors in Chapter 3, "Responses to Comments on the Draft EIR," for further details.

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 WRSI 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 is 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 WRSF, 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 (SGS 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 WRSF 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 WRSL 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.

OTHER REVISIONS

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The second paragraph on page 4.3-22 of the Draft EIR is revised as follows:

Although the actual construction schedule is unknown, construction of the project area, South Basin of the Pleasant Grove Retention Facility, and off-site transportation and utility improvements were assumed to begin as early as 2021. Construction of the North Basin of the Pleasant Grove Retention Facility was assumed to begin as early as 2026. Actual construction may begin later than assumed; therefore, this assumption is conservative because emissions generated by construction are expected to decrease in the future with increased emission controls and standards. Construction of the land uses under the SAP is anticipated to last 80 years, and this analysis assumes the pace of construction will be consistent during this 80-year period. While buildout of the plan is anticipated to be 20 years, construction under the PRSP is anticipated to last 18 years and would be driven by market demand. Buildout of the Sac State–Placer Center could take longer than buildout of the rest of the PRSP area.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The first paragraph on page 4.3-27 of the Draft EIR is revised as follows:

PRSP Area

Development under the PRSP was considered in the MTP/SCS 2036 at an intensity greater than what is analyzed in this EIR. The MTP/SCS 2036 assumed that the land use development under the PRSP would support 6,740 housing units and 20,155 jobs (SACOG 2016:25 in Appendix E-3) whereas the PRSP area is planned to support 5,8275,636 housing units and 16,488 jobs. Because the level of development assumed was more intensive in the MTP/SCS, development under the PRSP would be consistent with the MTP/SCS 2036 and, in turn, consistent with all applicable air quality plans. Consistent with the conclusion identified for the SAP, above, this impact would be less than significant.

To correct a typographical error, the second bullet of Mitigation Measure 4.3-2a on page 4.3-31 of the Draft EIR is revised as follows:

Mitigation Measure 4.3-2a: Implement PCAPCD's recommended construction mitigation measures (Net SAP Area and PRSP Area)

...

- ▲ The contractor shall submit to the PCAPCD a comprehensive equipment inventory (e.g., make, model, year, emission rating) of all the heavy-duty off-road equipment (50 horsepower ~~of or~~ greater) that will be used in aggregate of 40 or more hours for the construction project. If any new equipment is added after submission of the inventory, the contractor shall contact the PCAPCD before the new equipment being utilized. At least three business days before the use of subject heavy-duty off-road equipment, the project representative shall provide the PCAPCD with the anticipated construction timeline including start date, name, and phone number of the property owner, project manager, and on-site foreman.

To correct a typographical error, the first bullet of Mitigation Measure 4.3-3c on page 4.3-39 of the Draft EIR is revised as follows:

Mitigation Measure 4.3-3c: Purchase ROG and NO_x offsets through PCAPCD's Off-Site Mitigation Fee Program (Net SAP Area and PRSP Area)

...

- ▲ Establish mitigation off-site within the west Placer County by participating in an off-site mitigation program, coordinated by PCAPCD. Examples include, but are not limited to: participation in a biomass program that provides emissions benefits; retrofitting, repowering, or replacing heavy-duty engines from mobile sources (e.g., buses, construction equipment, on road haulers); or other programs to reduce emissions.

The County has revised Mitigation Measure 4.3-5a on page 4.3-46 of the Draft EIR, as follows, to address currently planned industrial expansions in the net SAP area and to provide specific measures for residential development that may be proposed near existing/planned industrial development:

Mitigation Measure 4.3-5a: Incorporation of design features at truck loading areas to reduce health-risk exposure at sensitive receptors (Net SAP Area and PRSP Area)

~~Before Design Review approval~~ Prior to Design Review approval and/or issuance of grading permit, project proponents shall design developments new development shall be designed so that truck loading/unloading facilities and sensitive receptors are not located within 1,000 feet of ~~each other~~ existing or planned sensitive receptors, if feasible considering site design parameters. Existing or previously approved industrial/commercial development, including any development within boundaries of existing industrial parks, are not subject to this mitigation measure. For the purpose of this mitigation measure, a truck loading/unloading facility is defined as any truck distribution yard, truck loading dock, or truck loading or unloading area where more than one truck with three or more axles will be present for more than 10 minutes per week, on average; and sensitive receptors include residential land uses, campus dormitories and student housing, residential care facilities, hospitals, schools, parks, playgrounds, or daycare facilities. A truck loading/unloading facility ~~and a sensitive receptor~~ can be located within 1,000 feet of ~~each other~~ a sensitive receptor only if ~~a project proponent~~ the project applicant prepares a qualified, site-specific HRA showing that the associated level of cancer risk at the sensitive receptors would not exceed 10 in 1 million. The HRA shall be conducted in accordance with guidance from PCAPCD and shall be approved by PCAPCD. If the HRA determines that a nearby sensitive receptor would be exposed to an incremental increase in cancer risk greater than 10 in 1 million then design measures shall be incorporated to reduce the level of risk exposure to less than 10 in 1 million. Design measures may include but are not limited to the following:

- ▲ Implement Mitigation Measure 4.3-3a, which requires all truck loading/unloading facilities to be equipped with one 110/208-volt power outlet for every two-truck loading/unloading facility. A minimum 2-foot-by-3-foot sign shall be clearly visible at each loading dock that indicates, “Diesel engine idling limited to a maximum of 5 minutes.” The sign shall include instructions for diesel trucks idling for more than 5 minutes to connect to the 110/208-volt power to run any auxiliary equipment. This measure is recommended in PCAPCD’s *CEQA Handbook* (PCAPCD 2017a) and is also consistent with measure VT-1 in the CAPCOA guide (CAPCOA 2010:300–303).
- ▲ The use of electric-powered “yard trucks” or fork lifts to move truck trailers around a truck yard or truck loading/unloading facility.
- ▲ The use of buildings or walls to shield commercial activity from nearby residences or other sensitive land uses.
- ▲ The use of EPA-rated Tier 4 Final engines in diesel-fueled construction equipment when construction activities are adjacent to existing sensitive receptors.
- ▲ Plant and maintain a vegetative buffer between the truck loading/unloading facility and nearby sensitive residences, schools, and daycare facilities. As part of detailed site design, a landscape architect licensed by the California Landscape Architects Technical Committee shall identify all locations where trees should be located, accounting for areas where shade is desired such as along pedestrian and bicycle routes, the locations of solar photovoltaic panels, and other infrastructure.

Applicants of residential or commercial development with new sensitive receptors proposed to be located within 1,000 feet of existing and/or planned commercial/industrial facilities that include, or may include, truck loading/unloading facilities, shall prepare an HRA as described above. Design measures identified in the HRA may include but are not limited to the following:

- ▲ Redesign the project to increase the distance between sensitive receptors and potential truck loading/unloading facilities:
- ▲ Use of upgraded filtration systems in the residential HVAC systems:
- ▲ Use of intervening buildings or walls to shield the receptors from the truck loading/unloading facility:
- ▲ Plant and maintain a vegetative buffer between sensitive receptors and the truck loading/unloading facilities. As part of detailed site design, a landscape architect licensed by the California Landscape Architects Technical Committee shall identify all locations where trees should be located, accounting for areas where shade is desired such as along pedestrian and bicycle routes, the locations of solar photovoltaic panels, and other infrastructure.

The County has revised the proposed amendment to the General Plan landfill buffer policy to eliminate the newly proposed allowance of residential uses within 1,000 feet of the landfill with approval of a specific plan, master plan, or development agreement. To reflect this change, the third full paragraph on page 4.3-49 of the Draft EIR is revised as follows:

Existing and Post-Project Landfill Odor

As described above, there are several existing odor sources in and near the project area, including the WRSI operations. An amendment of County General Plan Policy 4.G.11 is proposed to permit a reduction in the 1-mile (5,280-foot) buffer for residential uses to 2,000 feet with approval of a specific plan, master plan, or development agreement. ~~While the PRSP proposes residential uses 2,000 feet from the landfill property line, the amended General Plan Policy 4.G.11 would allow for future specific plans to propose, residential uses to be developed as close as 1,000 feet from the~~

~~landfill property line.~~ In addition, while residential use is not a central feature of proposed land uses in the net SAP area, housing may be incorporated as a subordinate use into net SAP area projects in the, Innovation Center, Entertainment Mixed-Use, and Light Industrial land use designations. This provision would allow people to live and work in the same region, shorten commute times, and reduce vehicle miles traveled, but could put additional residential uses in closer proximity to the landfill, substantially increasing the exposure of people to objectionable odors.

2.1.8 Revisions to Section 4.4, “Biological Resources”

In response to public comment, the County has added Policy NR-4.5 to the SAP to further protect adjacent wetlands. To that end, the bulleted list of SAP policies on page 4.4-32 of the Draft EIR is revised as follows (these revisions apply to the SAP and to the Draft EIR):

- ▲ **Policy NR-4.5: Construction Management Adjacent to Open Space.** To protect biological resources in designated Open Space areas, either within or adjacent to the Sunset Area, the County shall require development activities to limit disturbance during construction to the minimum area necessary for construction and access and will prohibit fill within any preserved waters of the U.S. and habitat for Endangered Species unless permitted by the Agencies. To ensure this protection, the County will require that the following protective measures be taken prior to or during project construction:

 - A. Improvement plans that show the boundaries and label the Open Space areas
 - B. For projects adjacent to the City of Roseville’s Open Space preserve areas, the County shall coordinate with the City of Roseville to ensure protection of preserve areas consistent with the City’s Open Space Preserve Overarching Management Plan
 - C. Pre-construction meetings for construction occurring adjacent to (within 250 feet) or within Open Space areas to address the presence of the Open Space, the sensitive habitats present, minimization of disturbance to the Open Space, and the requirements for preservation of habitat
 - D. Biological monitor to observe construction activities occurring within 250 feet of adjacent Open Space Preserve unless there is clearly not foreseeable impact to Open Space habitats
 - E. Permits as needed from the Corps, Service, and the County prior to initiation of grading within the open space areas
 - F. Temporary construction fencing will be required prior construction adjacent to or within any Open Space area
 - G. Flagging of preserved wetlands adjacent to construction within the Open Space
 - H. Stormwater pollution prevention BMPs and a Stormwater Pollution Prevention Plan (SWPPP) to prevent pollutant discharges into the Open Space for any project over one acre in size to control sediment and erosion during construction.
 - I. Temporary stormwater discharge measures (e.g., discharge points, swales) to properly direct flows and ensure that erosion does not take place at any location along the swale or at the point of discharge to avoid discharge into vernal pools and inundation of oak trees.
 - J. Use of native grasses in post construction revegetation

K. Trash removal and post construction clean-upL. Post-construction remediation construction impacts as needed

In response to comment 16-5 and to clarify that the mitigation measure is intended to relocate turtles to equal- or better-quality habitat than the affected habitat and protect eggs and hatchlings as well as adult turtles, Mitigation Measure 4.4-5a on page 4.4-59 of the Draft EIR is revised as follows:

Mitigation Measure 4.4-5a: Minimize and avoid disturbances to western pond turtle, burrowing owl, Swainson's hawk, and tricolored blackbird; compensate for loss of occupied habitats (Net SAP Area and PRSP Area)

Western Pond Turtle

Before ground disturbing activities, project proponents shall retain a qualified biologist to determine whether the potential project site contains suitable habitat for western pond turtle. For projects or ground-disturbing activities (including any required off-site improvements) with potential to disturb suitable aquatic or adjacent upland habitat for western pond turtle, the following measures shall be implemented.

- ▲ Within 24 hours before beginning construction activities within ~~200~~ 300 feet of suitable aquatic habitat for western pond turtle, a qualified biologist shall survey areas of anticipated disturbance for the presence of western pond turtle, including eggs and hatchlings. The construction area shall be re-inspected whenever a lapse in construction activity of two weeks or more has occurred. If pond turtles or their eggs are found during the survey or observed within the construction area at any other time, they shall be relocated by a qualified biologist, outside of the area of disturbance, to the nearest area ~~with~~ of suitable aquatic habitat of equal or better quality as the affected habitat. and CDFW will be notified of the discovery and relocation of any western pond turtles.
- ▲ If western pond turtle nests are found in the disturbance area during preconstruction surveys, a 300-foot no disturbance buffer shall be established between the nest and any areas of potential disturbance. Buffers shall be clearly marked with temporary fencing. Construction will not be allowed to commence in the exclusion area until hatchlings have emerged from the nest, or the nest is deemed inactive by a qualified biologist. When hatchlings emerge from the nest, they shall be relocated by a qualified biologist to suitable aquatic habitat outside of the area of disturbance.

To correct a typographical error, the fourth bullet of Mitigation Measure 4.4-7a on page 4.4-67 of the Draft EIR is revised as follows:

Mitigation Measure 4.4-7a: Avoid or compensate for loss of protected trees (Net SAP Area and PRSP Area)

...

- ▲ The project proponent required to replace lost trees shall provide appropriate irrigation and maintenance to replacement trees and will enter into a maintenance agreement with the County. The project proponent shall post a deposit for the replacement cost of replanted trees to the County and the deposit shall be retained until the County arborist certifies that conditions of the tree permit have been satisfied.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Mitigation Measure 4.4-8c on page 4.4-70 of the Draft EIR is revised as follows:

Mitigation Measure 4.4-8c: Provide wildlife crossing structures (Net SAP Area and PRSP Area)

The County shall require road crossings over the stream system open space areas to be designed to provide safe wildlife movement using wildlife overpasses, underpasses, bridges, or culverts that are adequately sized to allow safe crossing even during high water. Design of crossings shall be based on movement requirements for the range of common and sensitive native wildlife species in the region. Where feasible and appropriate, fencing may be used to direct animals toward wildlife crossing structures and away from roadways. For the Sac State–Placer Center site, safe wildlife movement facilities shall be provided as applicable to the Sac State–Placer Center site.

2.1.9 Revisions to Section 4.5, “Archaeological, Historical, and Tribal Cultural Resources”

No revisions are needed.

2.1.10 Revisions to Section 4.6, “Geology and Soils”

No revisions are needed.

2.1.11 Revisions to Section 4.7, “Greenhouse Gas Emissions”

To provide a revision to SAP Policy NR-6.1, the first bullet on page 4.7-15 of the Draft EIR is revised as follows:

- ▲ **Policy NR-6.1: ~~mPOWER Incentive Program~~ Energy Conservation.** The County shall continue to support and implement the mPOWER incentive program energy efficiency and conservation strategies to reduce greenhouse gas emissions from buildings and other site improvements.

To provide a revision to SAP Policy NR-6.7, the seventh bullet on page 4.7-15 of the Draft EIR is revised as follows:

- ▲ **Policy 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.

In response to comment 5-1, Table 4.7-2 on page 4.7-19 of the Draft EIR is revised as follows:

Table 4.7-2 Unmitigated Operational Greenhouse Gas Emissions for Net SAP Area and PRSP Area at Full Buildout		
Emissions Activity	GHG Emissions (MTCO ₂ e/year)	
	Net SAP Area at Buildout	PRSP Area at Buildout
Hearths and landscape equipment	1,512 934	7,797
Electricity consumption	35,107	17,700
Natural gas combustion	46,112	18,233
Vehicle trips	282,392	147,988
Solid waste generation	10,469	7,109
Water consumption and wastewater generation	2,926	2,177
Total operational annual GHG emissions	378,518 377,940	201,004
PCAPCD De Minimis Level	1,100	1,100
PCAPCD Bright-Line Threshold	10,000	10,000
Notes: Totals may not add because of rounding.; GHG = greenhouse gas; MTCO ₂ e = metric tons of carbon dioxide equivalent; SAP = Sunset Area Plan; PRSP = Placer Ranch Specific Plan. Full buildout of the SAP area is expected to occur past 2050, the latest year for which mobile-source emission factors are provided by the EMFAC2014 model. Source: Modeling conducted by Ascent Environmental in 2018.		

To allow cogeneration as an option for reducing energy use, Mitigation Measure 4.7-2a on pages 4.7-20 to 4.7-21 of the Draft EIR is revised as follows:

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

The County will require project proponents of development proposed under the project to incorporate the following measures to reduce operational emissions of GHGs to the extent feasible.

...

Building Energy

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

...

- ▲ 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.

In response to comment 5-2, the discrepancies in the amount of mitigated GHG emissions are addressed and Mitigation Measure 4.7-2b on pages 4.7-21 and 4.7-22 of the Draft EIR is revised as follows:

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

The County will require project proponents of individual developments under the project to offset operational GHG emissions remaining after implementation of Mitigation Measure 4.7-2a. This

mitigation measure is consistent with guidance recommended by PCAPCD and CARB (PCAPCD 2017:54, CARB 2017:152). This measure is also consistent with the State CEQA Guidelines, which recommend several options for mitigating GHG emissions. State CEQA Guidelines Section 15126.4(C)(3) states that measures to mitigate the significant effects of GHG emissions may include “off-site measures, including offsets that are not otherwise required....”

Project proponents shall implement an off-site GHG emissions reduction program or to pay GHG offset fees to compensate for the project’s emissions in excess of 1,100 MTCO₂e for a single year, or as determined feasible by the County and project proponent. The off-site program shall comply with approved protocols from California Air Pollution Control Officers Association’s (CAPCOA) GHG Rx program or CARB’s Cap & Trade Offset protocols. Alternatively, the project proponent can purchase local or California-only GHG mitigation credits through the CAPCOA GHG Rx program or ARB accredited offset project registry. At the time this EIR was written, the average rate ranges from \$8 to \$35 per metric ton of CO₂e.

The net SAP area would generate ~~373,896~~ 367,900 MTCO₂e/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~372,795~~ 366,800 MT CO₂e for a period of one year, or 49.13 MTCO₂e/year per thousand square feet of nonresidential development and 27.27 MTCO₂e/year for each residential unit in the net SAP area. Based on the current average rate of \$12 per metric ton of CO₂e, the estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal \$5,120,190 (equivalent to \$0.66 per square foot for nonresidential and \$954 per residential unit).

PRSP would generate ~~195,014~~ 195,990 MTCO₂e/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~193,914~~ 194,890 MTCO₂e, or 27.14 27.27 MTCO₂e/year for each residential unit in the PRSP area. The estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal \$1,706,730 (equivalent to \$955 per residential unit). Detailed calculations for the Off-Site Mitigation Fee Program can be found in Appendix K.

This condition shall be satisfied prior to the recordation of each Small Lot Final Map or building permit issuance when a small lot map is not required.

PCAPCD and CARB also recommend that lead agencies prioritize direct investments in GHG emission reductions near the project site to provide potential local air quality and economic co-benefits. ~~For example, mPOWER is a local program in Placer County that provides financing to property owners for the installation of energy and water efficiency retrofits and renewable energy systems. Investing in mPOWER is consistent with the County’s General Plan Policy 2.G.5, as described above in Section 4.7.3, “Regulatory Setting.”~~

~~Other e~~Examples of local direct investments include financing installation of regional electric vehicle-charging stations, paying for electrification of public school buses, and investing in local urban forests. However, it is critical that any such investments in actions to reduce GHG emissions are real and quantifiable, as determined by the County, PCAPCD, or a consultant selected by the County.

Where development of a local offset is not feasible, the County will allow project proponents to mitigate GHG emissions through the purchase of ~~local or California-only~~ carbon credits issued through the CAPCOA GHG Rx program or CARB-accredited offset project registry. The purchase of carbon credits shall be prioritized in the following manner: offsite within the SVAB portion of Placer County, within Placer County, or within California.

The GHG reductions achieved through an offset or through the purchase of a carbon credit must meet the following criteria:

- ▲ **Real**—They represent reductions actually achieved (not based on maximum permit levels).
- ▲ **Additional/surplus**—They are not already planned or required by regulation or policy (i.e., not double counted).
- ▲ **Quantifiable**—They are readily accounted for through process information and other reliable data.
- ▲ **Enforceable**—They are acquired through legally binding commitments/agreements.
- ▲ **Validated**—They are verified through the accurate means by a reliable third party.
- ▲ **Permanent**—They will remain as GHG reductions in perpetuity.

The project applicant can satisfy the requirements of this measure by purchasing sufficient carbon credits through the accredited carbon credit registries, investing in a local GHG reduction project/program which complies with the approved protocol from the CAPCOA GHG Rx program or CARB's Cap-and-Trade offset protocols, or paying the calculated mitigation fee based on the carbon credit rate at the time of the recordation of the small lot final map or approval of the first building permit when a small lot map is not required. Demonstration of compliance shall be provided to the County and carbon offset purchases should be verified by a third party. If the mitigation fee is chosen, the fee should be calculated based on the required GHG reduction and the latest CARB Cap-and-Trade Program Auction Settlement Prices for GHG allowances at the time of the small lot final map recordation or building permit issuance when a small lot map is not required.

Establishment of offsets or purchases of carbon credits to offset operational generated GHG emissions should be made prior to recordation of each small lot final map, or approval of the first building permit when a small lot map is not required.

In response to comment 5-1, Table 4.7-3 on page 4.7-23 of the Draft EIR is revised as follows:

Emissions Activity	GHG Emissions (MTCO ₂ e)	
	Net SAP Area	PRSP Area
Landscape equipment	934 26	5,185
Electricity Consumption	32,840 26,555	15,715
Natural gas combustion	44,914 46,112	17,257 18,233
Vehicle trips	282,392	147,988
Solid waste generation	10,469	7,109
Water consumption and wastewater generation	2,346	1,760
PCAPCD De Minimis Level	1,100 MTCO ₂ e/year	1,100 MTCO ₂ e/year
PCAPCD Bright-Line Threshold	10,000 MTCO ₂ e/year	10,000 MTCO ₂ e/year
Total operational annual GHG emissions	373,895367,900	195,014195,990
Notes: Totals may not add because of rounding; GHG = greenhouse gas; MTCO ₂ e = metric tons of carbon dioxide equivalent; SAP = Sunset Area Plan; PRSP = Placer Ranch Specific Plan.		
Source: Modeling conducted by Ascent Environmental in 2018		

2.1.12 Revisions to Section 4.8, “Hazards and Hazardous Materials”

To correct a typographical error, Mitigation Measure 4.8-1a on pages 4.8-30 and 4.8-31 of the Draft EIR is revised as follows:

Mitigation Measure 4.8-1a: Complete a Phase I ESA (Net SAP Area)

A Phase I ESA shall be completed by project proponents of individual projects in the net SAP area. The Phase I ESA shall be performed in general conformance with the scope and limitations of ASTM E 1527-13 “Standard Practice for Environmental Site Assessments” and EPA “Standards and Practices for All Appropriate Inquiries,” 40 CFR Part 312. If existing hazardous materials contamination is identified in the Phase I ESA, and the Phase I ESA recommends further review, the project proponent shall retain a Registered Environmental Assessor or other qualified professional to conduct follow-up sampling to characterize the contamination and to identify any required remediation that shall be conducted. These recommendations shall be implemented, and the site shall be deemed remediated by the appropriate agency (DTSC, Placer County Department of Environmental Health Services [PCDEHS]) or Placer County shall issue a No Further Action letter before earth disturbance in the vicinity of the contamination.

To provide a minor clarification, Mitigation Measure 4.8-2 on page 4.8-36 of the Draft EIR is revised as follows:

Mitigation Measure 4.8-2: Implement measures specified in CCR Title 27 to minimize intrusion of landfill gas into structures (Net SAP Area and PRSP Area)

For any structure sited within 1,000 feet of the WRSL property boundary, the following measures specified in CCR Title 27 Section 21190(g) shall be included in the construction drawings ~~and/or blueprints~~ (as applicable) for review and approval by the County Health and Human Services Department:

2.1.13 Revisions to Section 4.9, “Hydrology and Water Quality”

In response to comment 4-45, the first full paragraph on page 4.9-28 of the Draft EIR is revised as follows:

The Pleasant Grove Retention Facility would function by diverting water from Pleasant Grove Creek and University Creek into adjacent retention basins during storm events. Stormwater would be retained in these basins until downstream flood events end, after which the stored water would be discharged into Pleasant Grove Creek (CES 2017a). The Lakeview Farms Retention Facility would accept stormwater runoff during high flows and allow infiltration in large, constructed wetlands. The Pleasant Grove Retention Facility is currently proposed as two large basins with a combined capacity of 3,461 acre-feet (CES 2017a). The Lakeview Farms Retention Basin would be a single large basin and would be expanded in phases. The first phase ~~(currently planned for construction in 2018)~~₁ (expected to begin construction in 2020) would hold 1,080 acre-feet of stormwater. The second phase would expand the facility to hold 2,800 acre-feet of stormwater, which would meet the projected needs of the City of Lincoln at buildout. The third and final phase could expand the facility to hold as much as 4,000 acre-feet of stormwater (CES 2017b). Both facilities would require expansion of their planned retention basins to accommodate future projected municipal flows and flows from the net SAP area. Technical studies prepared for the SAP found that both the Pleasant Grove and Lakeview Farms Retention Basins can be expanded to meet the stormwater retention needs of the SAP (CES 2017a, 2017b). Exhibit 3-23 shows the location of the potential regional stormwater retention facilities. Any changes to the Pleasant Grove or Lakeview Farms Retention Facility would occur only through the review and planning process of the appropriate jurisdictions (City of Roseville for the Pleasant Grove Retention Facility and the City of Lincoln for the Lakeview

Farms Retention Facility). (It should be noted that, as part of these review and planning processes, the retention facilities would all be designed and engineered according to applicable federal, state, and city standards, which would minimize potential for failure of a levee wall or other facility that could cause flooding of downstream properties.)

County staff initiated the following text change to provide clarification to Mitigation Measure 4.9-1b on page 4.9-32 of the Draft EIR.

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 if 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 ~~shall be~~ 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.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Mitigation Measure 4.9-5c on page 2-67 of the Draft EIR is revised as follows:

Mitigation Measure 4.9-5c: Prohibit grading within the 100-year floodplain (Net SAP Area and PRSP Area)

No grading activities of any kind may take place within the 100-year floodplain of the stream/drainageway unless approved and analyzed as part of this project. All work shall conform to provisions of the County Flood Damage Prevention Regulations (Section 15.52, Placer County Code). The location of the 100-year floodplain shall be shown on the Improvement Plans.

Prior to Improvement Plan approval and if required by the County Floodplain Administrator, the project proponent shall obtain from FEMA, a Conditional Letter of Map Revision (CLOMR) or Conditional Letter of Map Revision based on Fill (CLOMR-F) for fill within a Special Flood Hazard Area. A copy of the letter shall be provided to the Engineering and Surveying Division prior to approval of Improvement Plans. A Letter of Map Revision (LOMR), or a Letter of Map Revision based on Fill (LOMR-F) from FEMA shall be provided to the Engineering and Surveying Division prior to acceptance of project improvements as complete, or as otherwise approved for the Sac State–Placer Center site.

2.1.14 Revisions to Section 4.10, “Land Use”

The County has revised the proposed amendment to the General Plan landfill buffer policy to eliminate the newly proposed allowance of residential uses within 1,000 feet of the landfill with approval of a specific plan, master plan, or development agreement and replace it with a requirement that all new residential development proposed between 1 mile and 2,000 feet of any solid waste disposal site property boundaries requires approval of a specific plan, master plan, or development agreement. To reflect this change, the last paragraph on page 4.10-1 continuing to page 4.10-2 of the Draft EIR is revised as follows:

The Placer County Environmental Checklist also requires assessment of conflict with “[p]lan policies adopted for the purpose of avoiding or mitigating an environmental effect.” As described in detail in Chapter 3, “Project Description,” the project proposes an amendment to General Plan Policy 4.G.11, the purpose of which is to protect landfill facilities from incompatible encroachment. The policy currently requires that “new residential land uses...be separated from the property lines of active and future landfill sites by a buffer of one mile,” or 5,280 feet. The proposed policy would allow residential development as close as 1,000 feet to the Western Regional Sanitary Landfill (WRSL) with approval of a specific plan, master plan, or a development agreement with certain requirements. ~~Without a specific plan or development agreement, the minimum buffer zone would be 2,000 feet to the Western Regional Sanitary Landfill (WRSL) with approval of a specific plan, master plan, or development agreement.~~ This policy change is addressed below in Impact 4.10-2, Consistency and compatibility with the WRSL; in Section 4.3, “Air Quality,” Impact 4.3-6, Create objectionable odors affecting a substantial number of people; and in Section 4.15, “Utilities,” Impact 4.15-11, Potential impact on WRSL from incompatible land use that results in insufficient permitted capacity to serve waste disposal needs.

In response to comment 31-8 and to provide a correction to the number of hotel rooms at Thunder Valley Casino Resort, the second full paragraph on page 4.10-3 of the Draft EIR is revised as follows:

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

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).

The County has revised the proposed amendment to the General Plan landfill buffer policy to eliminate the newly proposed allowance of residential uses within 1,000 feet of the landfill with approval of a specific plan, master plan, or development agreement and replace it with a requirement that all new residential development proposed between 1 mile and 2,000 feet of any solid waste disposal site property boundaries requires approval of a specific plan, master plan, or development agreement. To reflect this change, the impact summary and the paragraph immediately following on page 4.10-14 of the Draft EIR are revised as follows:

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

The proposed project includes an amendment to the County General Plan Policy 4.G.11, which would reduce the buffer around the WRSL from 1 mile (5,280 feet) to 2,000 feet for residential development, ~~or 1,000 feet with the approval of a specific plan, master plan, or development agreement.~~ This proposed General Plan amendment could result in land use incompatibility due to residential development occurring closer to the WRSL in areas that would otherwise remain undeveloped under the current residential buffer policy. Based on review of existing data regarding nuisance complaints from residents beyond 1 mile, it is expected that new residents and users within the project area would complain about odor from the WRSL and that the number of complaints lodged about nuisance odors would increase. Such complaints could create pressure for the Western Placer Waste Management Authority (WPWMA) to implement additional odor control and reduction measures at the WRSL and, absent measures to control odors at the source and/or at receptors, could interfere with the ability of the landfill to expand or modify needed operations. Impacts relative to consistency and compatibility of proposed land uses with the WRSL would be **potentially significant**.

Net SAP Area and PRSP Area

An amendment to County General Plan Policy 4.G.11 is proposed to permit a reduction in the 1-mile (5,280-foot) buffer zone to 2,000 feet for residential development ~~or to 1,000 feet with approval of a specific plan, master plan, or development agreement.~~ While ~~the closest residential development proposed as part of the PRSP would be 2,000 feet from the landfill property line, the amended General Plan Policy 4.G.11 would allow future specific plans to propose residential development as close as 1,000 feet from the landfill property line.~~ In addition, while residential development is not a central feature of proposed land uses in the net SAP area, housing may be incorporated as a subordinate use into SAP projects in the General Commercial, Innovation Center, Entertainment Mixed-Use, and Light Industrial land use designations. This provision would allow people to live and work in the same region, shorten commute times, and reduce vehicle miles traveled, but could put additional residential uses in closer proximity to the landfill.

To reflect the revision to proposed change to the General Plan landfill buffer policy described above, page 4.10-17 of the Draft EIR is revised as follows:

Implementation of the proposed SAP, including the PRSP, would result in subsequent projects that could result in residential development within 2,000 feet of the landfill, ~~or within 1,000 feet if approved through a specific plan, master plan, or development agreement.~~ While measures can be implemented in an attempt to minimize landfill odors, the odors cannot be completely eliminated. Regardless of the buffer distance established through policy, implementation of the project is likely to result in an increase in the number of odor complaints received by WPWMA and PCAPCD. Such complaints could lead to increased pressure for WPWMA to implement odor control and reduction measures at the WRS. Impacts relative to consistency and compatibility of proposed land uses with the WRS would be **potentially significant**.

To reflect the new mitigation measures added in Section 4.3, “Air Quality,” to reduce objectionable odors, 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 WRS. 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.

2.1.15 Revisions to Section 4.11, “Noise”

In response to comment 4-50, Mitigation Measure 4.11-4b on page 4.11-36 of the Draft EIR is revised as follows:

Mitigation Measure 4.11-4b: Reduce exposure to new sensitive land uses from the existing Roseville Power Plant 2 (PRSP Area)

- ▲ Before approval of small-lot tentative maps, the project proponent shall demonstrate that the building occupants of new residential or other sensitive land use within the PRSP area are not exposed to noise levels from the RPP2 that exceed Placer County land use compatibility standards (e.g., 60 dBA L_{dn} /CNEL for residential uses), daytime and nighttime noise limits for sensitive receptors (i.e., 45 dBA L_{eq} /65 dBA L_{max} [night], 55 dBA L_{eq} /70 dBA L_{max} [day]).
- ▲ If achievement of the Placer County noise standards cannot be met by providing adequate setback of at least 590 feet from the RPP2 (i.e., distance at which nighttime L_{eq} standard is met), then the County shall require the developer, at developer’s expense, to construct a sound wall be constructed between the existing RPP2 and any new sensitive receptors. The sound wall shall be designed by an acoustical engineer and constructed and placed in a manner that achieves, at a minimum, a 5 dB reduction in sound. The wall design shall be coordinated with the City of Roseville. The wall or a combination of wall and setbacks shall result in achievement of Pacer County noise standards.

In response to comment 4-18 and to clarify what type of concrete is required, Mitigation Measure 4.11-5a on page 4.11-43 of the Draft EIR is revised as follows:

Mitigation Measure 4.11-5a: Reduce noise levels associated with new, expanded, or extended roads (Net SAP Area and PRSP Area)

Before finalizing roadway design for roadway expansion or new roadway construction, a design-level acoustical study shall be prepared to identify specific roadway design considerations, which shall be incorporated into final road design and approved by Placer County for roadways that result in a substantial increase in noise identified by Tables 4.11-12, 4.11-13, and 4.11-14. Roadway segments outside of Placer County are excluded (Fiddymont Road extension, Foothills Boulevard extension, and Woodcreek Oaks Boulevard extension). The following design features shall be considered:

- ▲ Roadway design shall provide sufficient setback between occupied structures that are defined as sensitive land uses by Placer County (or planned future sensitive land uses) and the roadway to minimize noise exposure to the extent feasible.
- ▲ In locations where setback is not feasible to reduce noise levels at existing or planned future sensitive receptors, roadway design shall incorporate quiet pavement types such as rubberized asphalt concrete (RAC) achieving at least a 4-dB decrease in traffic noise where feasible.
- ▲ Where existing sensitive receptors are located such that neither setback, nor quiet pavement, can reduce traffic noise from new or expanded roads associated with the project, the County shall coordinate with property owners of the existing residences regarding installation of sound walls along property lines to minimize traffic noise to meet exterior noise standards (city or County, as applicable) and, if necessary to meet the 45-dBA interior noise standards, upgrading windows that face the new or extended roadway.

2.1.16 Revisions to Section 4.12, “Population, Employment, and Housing”

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Table 4.12-7 on page 4.12-10 of the Draft EIR is revised as follows:

Table 4.12-7 Project Housing, Population, and Employment at Buildout			
	Net SAP Area	PRSP Area	Total
Housing units ¹	2,458	5,636	8,094
Population ¹	6,095	13,219	19,314
Jobs ²	40,804	14,956	55,760
Data compiled by Ascent Environmental in 2017			
¹ Does not include Sac State–Placer Center housing or population.			
² Includes jobs within Sac State–Placer Center site.			

2.1.17 Revisions to Section 4.13, “Public Services”

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The last paragraph on page 4.13-18 of the Draft EIR is revised as follows:

Thus, for projects under the jurisdiction of Placer County, either the parks and recreation facilities requirements must be enumerated in the specific plan, or they default to requirements in the zoning ordinance. The zoning ordinance requires consistency with general plan goals (5 acres of passive

and 5 acres of improved parkland per 1,000 residents), with specific ratios and credits based on development type, as defined (planned development, subdivision, and so on). See Chapters 15, 16, and 17 of the *Placer County Code* for specific requirements).

In response to comment 3-19, 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.~~

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The second paragraph on page 4.13-26 of the Draft EIR is revised as follows:

PRSP Area

Implementing the PRSP would result in development on approximately 2,200 acres of previously undeveloped land and result in 13,219 new residents, up to 30,000 students and associated faculty and staff, and potentially up to 5,000 on-site student housing units beds and 200 on-site faculty/staff housing units in a primarily undeveloped portion of west Placer County, resulting in an increase in demand for fire protection and emergency response services similar to that described above for the net SAP area. As shown in Table 3.14-5, implementing the PRSP, including the Sac State–Placer Center, could create demand for up to 21 firefighters and four support/planning personnel.

In response to comment 3-15 and 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 is 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.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The impact summary for Impact 4.13-2 on page 4.13-27 of the Draft EIR is revised as follows:

Impact 4.13-2: Increased demand for law enforcement services

Implementation of the project would allow for the development of more than 2,400 dwelling units in the net SAP area and more than 5,600 dwelling units in the PRSP area. In addition, on-campus housing for students, faculty, and staff may be provided. The increase in the number of residences and jobs in the project area would generate demand for at least 19 additional Placer County Sheriff officers, assuming the Sac State–Placer Center would provide its own law enforcement personnel and facilities. A sheriff's substation is currently planned as part of the Placer Vineyards Specific Plan and would serve the project area and would be designed to accommodate the additional officers

generated by the project. Individual residential projects in the SAP area would pay the County Public Facilities Impact Fee toward their fair share of demand for law enforcement facilities in compliance with SAP Policies PFS-7.1 and PFS-7.2 and Placer County General Plan Policy 4.H.4. The Sac State–Placer Center would provide its own law enforcement personnel and facilities. Implementation of the project would increase demand for law enforcement services; because Placer County has policies in place to fund, staff, and maintain adequate law enforcement facilities and services, no adverse effect on such levels of service would occur; however, no specific funding mechanism are in place for the project. Therefore, the impact would be **potentially significant**.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The second paragraph on page 4.13-29 of the Draft EIR is revised as follows:

PRSP Area

Law enforcement for the PRSP area would be provided by CHP, and the Placer County Sheriff's Office, and CSU Sacramento. Implementing the PRSP would affect CHP services in a manner similar to that described above for the net SAP area. Implementing the PRSP is anticipated to generate up to 5,636 dwelling units, 13,219 residents, up to 30,000 students and associated faculty and staff, and potentially up to 5,000 on-site student housing units beds and 200 on-site faculty/staff housing units, which would create additional demand for law enforcement services. Future development in the PRSP area would implement SAP policies and *Placer County General Plan* policies pertaining to law enforcement staffing and emergency response standards described above for the net SAP area. As shown in Table 4.13-6, buildout of the PRSP area would generate demand for 16 officers with the potential for additional demand for officers associated with nonresidential development in the PRSP area. Thus, implementing the PRSP would be anticipated to create demand for officers greater than the need indicated in Table 4.13-6. Increased demand for law enforcement facilities and services associated with the Sac State–Placer Center would be met through law enforcement staff, facilities, and services provided by CSU Sacramento on the campus.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The last paragraph on page 4.13-31 of the Draft EIR is revised as follows:

PRSP Area

The PRSP area is served by schools in the RCSD and RJUHSD, with a small portion of PRSP's campus park land use located within the Western Placer Unified School District, which is not assumed to generate a student population. As described under "Schools" in Section 4.13.2, above, schools in the RCSD and RJUHSD have available capacity to serve additional students. The number of students estimated to be generated by buildout of residential development in the PRSP area is shown in Table 4.13-8. Implementing the PRSP would generate approximately 1,261, 435, and 583 elementary, middle, and high school students, respectively. Housing to serve up to 200 faculty or staff members may be provided in the Sac State–Placer Center; if it is, it also could generate additional students in the RCSD and RJUHSD. The student generation calculation includes the 200 faculty/staff units as LDR/MDR units, as shown in Table 4.13-8.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The impact summary for Impact 4.13-4 on page 4.13-33 of the Draft EIR is revised as follows:

Impact 4.13-4: Increased demand for library services

Implementation of the SAP would allow for development of more than 2,400 dwelling units, and the PRSP would create more than 5,600 dwelling units. In addition, on-campus housing for students, faculty, and staff may be developed. The increase in the number of residences in the project area would increase demand for library services from County libraries in Rocklin, as well as the nearest City of Roseville library. Individual residential projects in the project area would pay the County Public Facilities Impact Fee toward their fair share of demand for library facilities in compliance with SAP

Policies PFS-1.2, PFS-2.1, PFS-2.2, and PFS-2.3 and Placer County General Plan Policies 4.A.2 and 4.A.5. The Sac State–Placer Center would provide its own library services. Because Placer County has policies place to fund, staff, and maintain adequate library facilities and services, no adverse effect to library services would occur; however, no specific funding mechanism for the project are currently in place. The impact would therefore be **potentially significant**.

County staff initiated the following text revision to Mitigation Measure 4.13-4 on page 4.13-35 of the Draft EIR in order to provide additional interim library service.

Mitigation Measure 4.13-4: Create or annex into a CFD for library services (Net SAP Area and PRSP Area)

Prior to either the recordation of Final Subdivision Maps or the approval of Improvement Plans, for each property, whichever occurs first, the developer shall create a CFD, CSA Zone of Benefit, annex to an existing CSA Zone of Benefit, or combination thereof, for the purposes of funding supplemental revenue for library facilities, operations, and maintenance. The chosen mechanism shall include a landowner-approved special tax of an adequate amount, or other financing mechanism acceptable to the County, to ensure that a funding mechanism for library services is in place to provide adequate library services to the net SAP area and PRSP area during all stages of development. The County will provide interim library services through one or more means, including usage of the Bookmobile to provide temporary library services, establishment of a satellite library office within SAP or immediately adjacent to, or establishment of a satellite office at 1000 Sunset Boulevard, Rocklin, CA 95677 or other equivalent means beginning at 25 percent buildout of the PRSP or as otherwise determined by the County. These interim library services may become permanent means to provide library services to the plan area if a regional library is not constructed to serve the plan area or a joint partnership with the University has not been agreed to, to provide library services to PRSP before buildout of 75 percent of the DUE's in the plan area or as determined by the County.

To clarify the impact conclusion for Impact 4.13-9 as a result of revisions to Mitigation Measure 4.13-1b (shown above), the first paragraph on page 4.13-43 of the Draft EIR is revised as follows:

Fire services are provided based on established service standards reflected in the *Placer County General Plan* and requirements of Placer County Fire. Cumulative development projects listed in Table 4.0-2 are either located outside of the service area of Station #77; are located within the city limits for Lincoln, Rocklin, or Roseville and are served by their respective fire departments, or would be annexed into one of these cities, such as Amoruso Ranch, for example. Therefore, implementation of the project would not cumulatively combine with other projects to result in a significant cumulative impact on fire protection and emergency response services. As described in Impact 4.13-1, future development in the net SAP area would be annexed into CFD No. 2012-1. As discussed in Chapter 3, “Project Description,” implementation of the PRSP would require construction of a new fire station, which would accommodate increased demand for fire protection services resulting from implementation of the SAP, including the PRSP. Implementation of the PRSP would also include formation of a County Service Area Zone of Benefit; formation of a CFD; and/or annexation into CFD No. 2012-1 (Sunset Area Fire and Emergency Services), including a landowner-approved special tax of an adequate amount, or other financing mechanism acceptable to the County, to ensure that a funding mechanism for fire protection services, infrastructure, and equipment is in place to provide adequate fire safety services to the PRSP area during all stages of development. The provision of fire protection and emergency services to the Sac State–Placer Center would be subject to provisions noted in the PRSP Development Agreement. With annexation into CDF No. 2012-1, establishment of appropriate funding mechanisms described, compliance with County policies, and implementation of Mitigation Measures 4.13-1 and 4.3-6, which would require funding for fire protection service to be in place prior to development and construction of ~~at two~~ new fire stations, implementing the project would not result in a considerable contribution to a cumulative impact on fire protection and emergency response services. The impact would be **less than significant**.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Cumulative Impact 4.13-10 on page 4.13-43 of the Draft EIR is revised as follows:

Cumulative Impact 4.13-10: Cumulative increase in demand for law enforcement services

Existing law enforcement services in the project area are sufficient to meet existing demand. Cumulative development listed in Table 4.0-2 and located in unincorporated western Placer County would result in growth that would place additional demand on existing law enforcement services, resulting in a potentially significant cumulative impact on existing law enforcement services and facilities. However, these development projects would be required by the County to pay the Public Facilities Impact Fee, which would include a fair-share contribution to meet demand for law enforcement facilities. Projects in Table 4.0-2 that are located in surrounding cities would be required to pay similar fees for provision of adequate law enforcement service. As required by Mitigation Measure 4.12-2, future development in the project area (excluding Sac State–Placer Center, which would provide its own law enforcement services) would also contribute its fair share toward the cost of providing law enforcement services and facilities through payment of the County Public Facilities Impact Fee, and County policies would require future project development to contribute fees toward the provision of law enforcement officers. With payment of the County Public Facilities Impact Fee, implementing the project would not result in a considerable contribution to a cumulative impact on law enforcement services. The impact would be **less than significant**.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Cumulative Impact 4.13-12 on page 4.13-44 of the Draft EIR is revised as follows:

Cumulative Impact 4.13-12: Cumulative increase in demand for library services

Library services in Placer County, the City of Rocklin, and the City of Roseville are not meeting the operational and facility goals of their respective jurisdictions. As development has occurred in Placer County, Rocklin, and Roseville, funding for expanding library services and facilities to meet growing demand associated with development has not been available. Cumulative development listed in Table 4.0-2 would result in development of more than 50,000 acres in the region, including the addition of more than 100,000 residential units and millions of square feet of non-residential building floor area. Projects located in Rocklin, Roseville, and unincorporated Placer County would result in growth that would place additional demand on existing library facilities, a significant cumulative impact on existing library services and facilities would occur. However, these development projects would be required by their respective jurisdictions to pay fees that would support expanding library services and providing additional facilities. The Village 5 Specific Plan recognizes that a new library could be constructed in the specific plan area or elsewhere in the City of Lincoln (City of Lincoln 2016:3.14-29 through 3.14-31). Additionally, Implementation of the project could cumulatively combine with other projects to result in a significant cumulative impact on library services and facilities. However, as required by Mitigation Measure 4.12-4, future development in the project area (excluding Sac State–Placer Center, which would provide its own library services) would contribute its fair share toward the cost of providing library facilities through payment of the County Public Facilities Impact Fee, and future project development would be required to contribute fees toward the provision of staffing and continued operation of public library services and facilities. With payment of the County Public Facilities Impact Fee, implementing the project would not result in a considerable contribution to a cumulative impact on library services and facilities. This impact would be **less than significant**.

2.1.18 Revisions to Section 4.14, “Transportation and Circulation”

In response to comment 4-63 and to correct the inadvertent omission in the Draft EIR of a reference to the a.m. peak hour in the City of Roseville General Plan LOS Policy, the bullet on page 4.14-29 of the Draft EIR is revised as follows:

- ▲ **Level of Service Policy 1:** Maintain a level of service (LOS) “C” standard at a minimum of 70 percent of all signalized intersections and roadway segments in the City during the a.m. and p.m. peak hours. Exceptions to the LOS “C” standard may be considered for intersections where the City finds that the required improvements are unacceptable based on established criteria identified in the implementation measures. In addition, Pedestrian Districts may be exempted from the LOS standard.

In response to comments regarding development capacity (for example, comment 4-13) and to provide the requirement for future traffic analysis for projects that exceed the 20-year horizon forecast, SAP Policy TM-1.9 on page 4.14-40 of the Draft EIR is revised as follows (these revisions apply to the SAP and to the Draft EIR):

- ▲ **Policy TM-1.9: Additional Traffic Impact Mitigation.** The County ~~shall~~may require applicants ~~further traffic analysis for land development projects to demonstrate consistency that are not consistent with the EIR land use assumptions of the EIR for this Plan. For projects that exceed these assumptions, the County will require additional traffic analysis and mitigation of impacts identified in the analysis. Future projects that exceed the level of development evaluated under the EIR’s projected 20-year development scenario (see EIR Table 3-3), will be required to prepare individual, project-specific traffic analysis, and identify specific mitigation measures to mitigate impacts as necessary.~~ Mitigation could include contribution to funding of transportation system improvement (e.g., traffic fees, VMT fees) and/or dedication of right-of-way for future improvements.

To provide a correction, Mitigation Measure 4.14-1a on page 4.14-51 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-1a: Widen Sunset Boulevard to four lanes from PRSP boundary to Placer Corporate Drive/South Loop Road (~~Net SAP Area and PRSP Area~~)

The Placer County Countywide CIP (Placer County 2018c) includes funding for the widening of Sunset Boulevard to four lanes from Cincinnati Avenue to SR 65. Prior to issuance of building permits, project proponents of development projects within the ~~SAP area, including the PRSP area~~, shall pay the applicable countywide traffic impact fees that are in effect in this area (Sunset District) pursuant to the applicable ordinances and resolutions, which will provide funding towards this improvement. The constructing party shall be eligible for fee credits for the applicable countywide traffic impact fees, as determined by DPWF.

To provide a correction, Mitigation Measure 4.14-1b on page 4.14-51 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-1b: Construct extension of Foothills Boulevard as a four-lane arterial between PRSP area and its current northern terminus in City of Roseville (Net SAP Area and PRSP Area)

To provide a correction, the second full paragraph on page 4.14-56 of the Draft EIR is revised as follows:

Mitigation Measures

Implement Mitigation Measures 4.14-1a (~~Net SAP Area and~~ PRSP Area) and 4.14-1b (~~Net SAP Area and~~ PRSP Area). Widening Sunset Boulevard to 4 lanes (Mitigation Measure 4.14-1a) would improve operations to an acceptable LOS C or better at the Sunset Boulevard / Cincinnati Avenue intersection. Widening Sunset Boulevard in connection with the opening of Phase I of Placer Parkway to traffic would also shift traffic demand from the Athens Avenue / Industrial Avenue intersection, which would improve operations to an acceptable LOS C. Furthermore, these two improvements in connection with the extension of Foothills Boulevard (Mitigation Measure 4.14-1b) would improve operations to an acceptable LOS C or better at the following project intersections.

To provide a correction, the last paragraph on page 4.14-58 continuing to page 4.14-59 of the Draft EIR is revised as follows:

Overall Significance after Mitigation

This impact would be **significant** from the time that project trips cause these intersections to begin operating at an unacceptable LOS (i.e., LOS D for intersections with a LOS C standard, or LOS E for intersections with an LOS D standard); or in the case of intersections that already operate at an unacceptable LOS, from the time that project trips result in a significant increase in delay as defined in the significance criteria for Placer County intersections. As noted above, this impact would remain **significant and unavoidable in the short-term** until the applicable roadway network improvements identified in the Dry Creek Benefit District of the Placer County Countywide CIP as well as improvements identified in Mitigation Measures 4.14-1a (~~Net SAP Area and~~ PRSP Area) and 4.14-1b (~~Net SAP Area and~~ PRSP Area) are implemented. Similarly, the intersections that would be improved by projects not currently in the Placer County Countywide CIP but are proposed to be included as part of Mitigation Measure 4.14-2c would remain **significant and unavoidable in the short-term** until the Countywide CIP update is adopted with the improvements included.

To provide a correction, the first paragraph on page 4.14-62 of the Draft EIR is revised as follows:

Mitigation Measures

Implement Mitigation Measures 4.14-1a (~~Net SAP Area and~~ PRSP Area), 4.14-1b (~~Net SAP Area and~~ PRSP Area), and 4.14-10 (Net SAP Area and PRSP Area). These measures include widening Sunset Boulevard, extending Foothills Boulevard between the PRSP area and City of Roseville, and capacity enhancements to SR 65, including payment of fees. These improvements in combination with the planned opening of Phase I of Placer Parkway would shift traffic demand from the following City of Roseville intersections, which would improve operations to an acceptable LOS C or better:

In response to comment 4-73, the first full paragraph of Mitigation Measure 4.14-3 on page 4.14-64 of the Draft EIR is revised as follows:

Placer County, in working with the City of Roseville to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Roseville to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Roseville intersections. In reaching an accommodation with the City of Roseville, the County and City, in order to better ensure an effective sub-regional approach to mitigating transportation-related impacts, may choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that “fair share” fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers,

must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County's transportation network. Any such arrangement(s), with ~~just~~ the City of Roseville or with additional agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels. Placer County shall hold these fees collected for improvements within the City of Roseville in trust for the expressed purpose of funding improvements to the specified facilities within the City.

To provide a correction, the second paragraph on page 4.14-70 of the Draft EIR is revised as follows:

Mitigation Measures

Implement Mitigation Measure 4.14-1b (Net SAP Area and PRSP Area). The extension of Foothills Boulevard between the PRSP area and City of Roseville would shift traffic demand from Woodcreek Oaks Boulevard to Foothills Boulevard. With this reduction in traffic on Woodcreek Oaks Boulevard, the Woodcreek Oaks Boulevard / Northpark Drive and Woodcreek Oaks Boulevard / Parkside Way intersections would no longer meet the MUTCD peak hour signal warrant under existing plus PRSP conditions.

In response to comment 4-73, the second full paragraph of Mitigation Measure 4.14-4 on page 4.14-71 of the Draft EIR is revised as follows:

As with Mitigation Measure 4.14-3, Placer County, in working with the City of Roseville to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Roseville to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Roseville intersections. In reaching an accommodation with the City of Roseville, the County and City, in order to better ensure an effective sub-regional approach to mitigating transportation-related impacts, may choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that "fair share" fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers, must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County's transportation network. Any such arrangement(s), with ~~just~~ the City of Roseville or with additional agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels. Placer County shall hold these fees collected for improvements within the City of Roseville in trust for the expressed purpose of funding improvements to the specified facilities within the City.

In response to comment 1-3, 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

In response to several comments regarding proposed transportation-related GHG mitigation measures, 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.

To provide a correction, Mitigation Measure 4.14-15b on page 4.14-115 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-15b: Require dedication of right of way to widen Fiddymment Road to six lanes from Athens Avenue to E. Catlett Road (Net SAP Area and PRSP Area)

Prior to Improvement Plan approval or Final Map recordation for subdivision projects, project proponents of individual development projects within the SAP area, ~~including the PRSP area,~~ shall dedicate sufficient right-of-way to widen Fiddymment Road to 6 lanes from Athens Avenue to E. Catlett Road in the future.

To provide a correction, Mitigation Measure 4.14-15c on page 4.14-115 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-15c: Require dedication of right-of-way to widen Sunset Boulevard to eight lanes from Placer Corporate Drive/South Loop Road to SR 65 (Net SAP Area and PRSP Area)

Prior to Improvement Plan approval or Final Map recordation for subdivision projects, project proponents of individual development projects within the SAP area, ~~including the PRSP area,~~ shall

dedicate sufficient right-of-way to widen Sunset Boulevard to 8 lanes from Placer Corporate Drive/South Loop Road to SR 65 in the future. Any development proposed on parcels affected by the future 8 lane facility shall be required as a condition of approval to provide an irrevocable offer of dedication to Placer County for a highway easement to accommodate the future 8 lane roadway improvements.

2.1.19 Revisions to Section 4.15, “Utilities”

In response to comment 7-9 and to provide a minor correction related to the timing of the Ophir water treatment plant (WTP), the third paragraph on page 4.15-4 of the Draft EIR is revised as follows:

The Ophir WTP has not yet been constructed, and timing is generally dependent on anticipated need. PCWA also plans to begin construction in 2018 on tThe first phase of the Ophir WTP and associated conveyance pipelines, which are currently under design and would provide treatment capacity of 10 mgd. The Ophir WTP would be constructed in three phases, for a total treatment capacity of 30 mgd (PCWA 2016a:3–4,39).

In response to comment 4-83 and to provide a minor clarification, the first paragraph on page 4.15-9 of the Draft EIR is revised as follows:

Wastewater collection facilities are in place to serve existing land uses in the SAP area and are provided through County Service Area (CSA) 28, Zone of Benefit 2A3. CSA Zones of Benefit have been developed in Placer County to own and operate utility systems and to assess customers of separate, specific areas based upon the costs of serving those areas. CSA 28, Zone of Benefit 2A3 was established to provide sewer services to the SAP area. The boundary of CSA 28, Zone of Benefit 2A3 includes all existing developed property in the net SAP area. As new development comes on line, it is required to annex to the CSA Zone of Benefit to connect to existing sewer collection facilities. SPWA partners (Placer County, SPMUD, and the City of Roseville) work together to monitor growth, plan for treatment plant expansions, and ensure that adequate wastewater treatment capacity is available in the SPWA area. Funding for CSA services are provided through property assessments. New development also must pay local and regional connection fees. The local connection fee is collected by the CSA and regional fees are forwarded to the City of Roseville as the contribution by the CSA Zone of Benefit toward payment of the bond debt related to the construction of the regional wastewater facilities (Placer County 2017a:12).

To provide a correction, the following new text is added to page 4.15-14 of the Draft EIR immediately preceding the section “Natural Gas”:

Pioneer Community Energy

Pioneer Community Energy is a community choice aggregator organized under a joint exercise of powers agreement between Placer County and the cities of Auburn, Colfax, Lincoln, Rocklin and Town of Loomis. It is organized for the purpose of providing electric generation and related electric services within the territory of its member jurisdictions.

In response to comment 4-85 and to provide a minor clarification, the second full paragraph on page 4.15-25 of the Draft EIR is revised as follows:

The SPWA is a joint powers authority formed to fund regional wastewater ~~and recycled water~~ facilities in southwestern Placer County for three partner agencies (the “participants”): City of Roseville, SPMUD, and Placer County. The regional facilities funded by the SPWA include trunk sewer lines and two wastewater treatment plants (WWTPs). All three participants transmit wastewater to these WWTPs. SPWA monitors compliance with funding and operational criteria established in the Funding and Operations Agreements among the participants.

In response to comment 3-19, 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.~~

In response to comment 7-11 and to require additional water quality testing to ensure safety, SAP Policy PFS-3.1 on page 4.15-33 of the Draft EIR is revised as follows (these revisions apply to the SAP and to the Draft EIR):

- ▲ **Policy PFS-3.1: Water Supply Certification.** The County shall require applicants for new development approval to demonstrate the availability of a long-term, reliable surface water supply for all urban uses as well as recycled water, where available, as an optional water supply. The County shall require written certification from the water service provider that a long-term water supply is or will be available for the new development prior to occupancy. The County will also require any proposed on-site wells used for potable water to be evaluated to ensure the groundwater meets California Drinking Water Standards and, if not, that the well is either appropriately relocated (at the applicant's expense) or any necessary water treatment processes and monitoring systems are installed and operating.

In response to comment 4-84, SAP Policy PFS-4.1 on pages 4.15-33 and 4.15-34 of the Draft EIR is revised as follows (these revisions apply to the SAP and to the Draft EIR):

- ▲ **Policy PFS-4.1: Wastewater Management.** The County shall coordinate with the Cities of Lincoln and Roseville to ensure efficient and effective management of wastewater. This includes ensuring that development projects proposed in the Sunset Area have access to sufficient capacity at either the Lincoln Wastewater Treatment and Reclamation Facility or the City of Roseville ~~Pleasant Grove~~ Wastewater Treatment Plants. For projects which exceed the planned wastewater and/or recycled water capacities outlined in the South Placer Wastewater Authority's South Placer Regional Wastewater and Recycled Water Systems Evaluation report, the County shall require project proponents to conduct additional wastewater and/or recycled water analysis and if supply is available projects will need to mitigate impacts identified in the analysis. Mitigation could include contribution to fund future infrastructure system improvements and expansion.

To provide a revision to SAP Policy NR-6.7, the seventh bullet on page 4.15-36 of the Draft EIR is revised as follows:

- ▲ **Policy 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.

In response to comment 7-15 and to provide a minor clarification, the fourth paragraph on page 4.15-40 of the Draft EIR is revised as follows:

As shown in Exhibit 4.15-4, PCWA transmission main pipelines would be extended through the PRSP area. The water distribution system in the PRSP area would consist of looping pipelines that form a transmission main grid consisting of 12-inch to 42-inch-diameter mains. The pipelines would be installed within collector and arterial roadway corridors. The system would include a 5.16-million-gallon potable water storage tank (co-located with a pump station and supply lay-down area) in the northwestern portion of the PRSP area, near Placer Parkway. Prior to construction of the water storage tank, site-specific geotechnical analysis would be prepared to confirm site suitability for the storage tank. The key components of the proposed potable water infrastructure system are shown in Exhibit 4.15-4. Note that the PCWA water transmission pipeline that would be installed in the Placer Parkway right-of-way is not identified in Exhibit 4.14-4. Please refer to Exhibit 3-3 for the location of the PCWA pipeline in Placer Parkway.

To provide a minor correction to the amount of wastewater flows that would be generated by buildout of the net SAP area, the impact summary and the last paragraph on page 4.15-47 of the Draft EIR are revised as follows:

Impact 4.15-4: Increased demand for wastewater treatment services

The wastewater flows generated by buildout of the PRSP and net SAP areas are estimated to be 1.99 and ~~3.78~~ 3.8 mgd, respectively, for a combined total of 5.77 mgd ADWF. The PGWWTP currently treats 7.1 mgd ADWF, has an operating treatment capacity of 9.5 mgd ADWF, and is permitted to discharge 12 mgd ADWF in compliance with its NPDES Permit. The plant has available capacity to treat an estimated 2.4 mgd. While wastewater flows from the PRSP area alone could be treated at the PGWWTP, the wastewater collection system would be designed to convey combined buildout flows from both the net SAP and PRSP areas to the PGWWTP. Therefore, any volume beyond that allowed by the PGWWTP's existing NPDES permit would be require additional capacity and a new permit that would identify wastewater treatment requirements. Wastewater flows from the PRSP area would not cause permit limits to be exceeded, but the PGWWTP would not have sufficient capacity to treat the estimated combined wastewater flows from buildout of the net SAP and the PRSP areas. Placer County requires project proponents to obtain written confirmation from SPWA to demonstrate that wastewater treatment services would be provided. While wastewater treatment capacity is sufficient in the nearer term to accommodate buildout of the PRSP area (over approximately 20 years), it is currently insufficient to serve treatment needs from ultimate buildout of the net SAP (over approximately 80 years) and PRSP areas. The project's wastewater flows would require eventual expansion of the PGWWTP. The impact of increased demand for wastewater treatment services would be **significant**.

Net SAP Area

Buildout of the net SAP area would generate an estimated ~~3.78~~ 3.8 mgd of wastewater during periods of ADWF, as shown in Table 4.15-10. This figure includes 0.2 mgd from the Lincoln 270 area between Industrial Boulevard and SR 65, which is not part of the net SAP area, but that could flow through the net SAP area to the PGWWTP (Table 4.15-10). To calculate flows for the net SAP area, flow rates consistent with the System Evaluation report were applied to the proposed land uses. As shown in Exhibit 4.15-3, the portion of the net SAP area east of Fiddymment Road is located within the Regional Service Area Boundary of the PGWWTP, but the approximately 1,700-acre portion west of Fiddymment Road is outside the Ultimate Service Area boundary. This area is projected to generate an ADWF of 1.14 mgd. However, there are areas within the studied watershed that would generate little or no flow and some existing areas may be generating less flow than assumed in the Systems Evaluation.

To provide a minor correction to the amount of wastewater flows that would be generated by buildout of the net SAP area, the second full paragraph and Table 4.15-10 on page 4.15-48 of the Draft EIR are revised as follows:

On April 5, 2017, the City of Roseville approved a project to expand the PGWWTP treatment capacity, which would increase the treatment capacity from 9.5 mgd to 12 mgd (City of Roseville 2017c). Construction of the PGWWTP expansion project is anticipated to begin in 2018 and be completed within 2 years. Once the PGWWTP expansion project is complete, and with existing treatment flows, the estimated available capacity of the PGWWTP would be 4.9 mgd ADWF, which would be sufficient to serve net SAP buildout flows of ~~3.78~~ 3.8 mgd.

Table 4.15-10 Net Sunset Area Plan Area Wastewater Flows

Land Use	Flow Rate (gpd/ac) or (gpd/du)	Area Size (acres)	EDUs ¹	ADWF (mgd)
General Commercial	850	34	-	0.03
Entertainment Mixed-Use	2,300	418	-	0.96
Residential	190	52	2,458	0.45 <u>0.47</u>
Casino ²	-	47	-	0.25
Business Park	850	142	-	0.12
Innovation Center	850	1,058	-	0.90
Eco-Industrial ³	850	200	-	0.17
EDUs ¹	190	-	200	0.04
Light Industrial	850	744	-	0.63
Public Facility	850	2	-	0.002
Preserve/Mitigation Reserve	-	1,943	-	0.00
Lincoln 270 Area ⁴	-	-	-	0.23
TOTAL	NA	4,827	2,458	3.782 <u>3.802</u>

Notes: ADWF = average dry weather flow, ac = acre, du = dwelling unit, EDU = equivalent dwelling unit, gpd = gallons per day, mgd = million gallons per day, NA = not applicable.

¹ EDUs not included in total residential dwelling units for the SAP. EDUs are generally defined as a unit of measure for the sewage generated from particular buildings, structures or uses. One equivalent dwelling unit is equal to an approximation of the amount of sewage generated by an average single-family residence.

² ADWF from Athens Avenue Sewer Study.

³ Only 200 acres of the Eco-Industrial land use designation generate sewage.

⁴ Area outside the SAP area, ADWF from Athens Avenue Sewer Study.

Source: Placer County 2017a:15

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Table 4.15-13 on page 4.15-56 of the Draft EIR is revised as follows:

Table 4.15-13 Estimated Solid Waste Generated by Operation of the Sunset Area Plan and the Placer Ranch Specific Plan

Land Use Designation	Estimated Residents	Jobs	Non-Residential Disposal Rate (tons/employee/year)	Residential Disposal Rate (lb/resident/day)	Non-Residential Waste (tons/day)	Non-Residential Waste (tons/year)	Non-Residential Waste (cubic yards/year)	Residential Waste (tons/day)	Residential Waste (tons/year)	Residential Waste (cubic yards/year)	Generation Total (tons/day)	Generation Total (tons/year)	Generation Total (cubic yards/year)	Disposal Total (cubic yards/year) ¹
Net SAP Area														
General Commercial	0	440	1.52	7	1.83	669	892	0.00	0	0	1.83	669	892	446
Entertainment Mixed-Use	929	6,120	1.52		25.49	9,302	12,403	3.25	1,187	1,582	28.74	10,489	13,986	6,993
Business Park	0	2,210	0.79		4.78	1,746	2,328	0.00	0	0	4.78	1,746	2,328	1,164
Innovation Center	5,166	24,000	0.79		51.95	18,960	25,280	18.08	6,600	8,799	70.03	25,560	34,079	17,050
Eco-Industrial	0	7,920	0.64		13.89	5,069	6,758	0.00	0	0	13.89	5,069	6,758	3,379
Light Industrial	0	3,530	0.64		6.19	2,259	3,012	0.00	0	0	6.19	2,259	3,012	1,506
Total	6,095	44,220	NA	NA	104.12	38,005	50,673	21.33	7,786	10,382	125.46	45,791	61,055	30,528
PRSP Area														
<u>Residential</u>	<u>13,219</u>	<u>0</u>	<u>0</u>	7	<u>0</u>	<u>0</u>	<u>0</u>	<u>46.27</u>	<u>16,887</u>	<u>22,515</u>	<u>46.27</u>	<u>16,887</u>	<u>22,515</u>	<u>11,258</u>
University	<u>13,219</u>	5,733	0.38		5.97	2,179	2,905	<u>46.27</u> <u>0</u>	<u>16,887</u> <u>0</u>	<u>22,515</u> <u>0</u>	<u>52.24</u> <u>5.97</u>	<u>19,066</u> <u>2,179</u>	<u>25,420</u> <u>2,905</u>	<u>12,710</u> <u>1,452</u>
Campus Park		7,354	0.79		15.92	5,810	7,746	<u>0</u>	<u>0</u>	<u>0</u>	15.92	5,810	7,746	3,873
General Commercial		593	1.52		2.47	901	1,201	<u>0</u>	<u>0</u>	<u>0</u>	2.47	901	1,201	601
Commercial Mixed Use		1,275	1.52		5.31	1,938	2,584	<u>0</u>	<u>0</u>	<u>0</u>	5.31	1,938	2,584	1,292
Total	13,219	14,955	NA	NA	29.67	10,828	14,436	46.27	16,887	22,515	75.94	27,715	36,951	18,476
Total (net SAP area + PRSP area)	19,314	59,175	NA	NA	133.79	48,833	65,109	67.60	24,673	32,897	201.40	73,506	98,006	49,004

Notes: lb = pounds, NA = not available.

¹ Total waste requiring disposal calculated by applying state-mandated solid waste recycling and diversion requirement of 50%.

Source: CalRecycle 2017b

To provide a minor correction to the amount of wastewater flows that would be generated by buildout of the net SAP area (see correction to Table 4.15-10, above), Table 4.15-14 on pages 4.15-67 and 4.15-68 of the Draft EIR is revised as follows:

Table 4.15-14 Summary of Buildout Average Dry Weather Flows for the SPWA Service Boundaries	
Description of Area	Wastewater Flows (mgd)
2005 PGWWTP Regional Service Area ¹	15.62
Curry Creek Specific Plan	2.72
Regional University	1.17
Inviro Tech	0.08
Orchard Creek	0.02
Creekview Specific Plan	0.37
Sierra Vista	1.37
Amoruso Ranch Specific Plan	0.61
Placer Ranch	1.99
Sunset Area Plan ²	3.78 <u>3.8</u>
Total⁴	27.73 <u>27.75</u>
Evaluated Treatment Facility Capacity Expansion	29.50 ³
	24.70 ⁴
	25.67 ⁵

Notes: ADWF = average dry weather flow, mgd = million gallons per day.

¹ 2005 PGWWTP Regional Service Area wastewater flows were revised from the Systems Evaluation estimates to exclude flows from Placer Ranch; however, insufficient detail was available to exclude flows that were estimated for the Placer County portion of the regional service area boundary and ultimate service area boundary that contains the SAP area. Thus, the total estimate of wastewater flows for buildout within the SPWA service boundaries is conservative. The Regional Service Area boundary also includes anticipated flows from the West Roseville Specific Plan.

² SAP estimated wastewater flows include 0.23 mgd ADWF generated within the Lincoln 270 area, which is outside SAP area but included in the Athens Avenue Sewer Study.

³ The WWMP EIR included analysis of expanding the PGWWTP to 29.50 mgd ADWF.

⁴ The WRSP Final EIR included analysis of expanding the PGWWTP to 24.70 mgd ADWF.

⁵ The Systems Evaluation included analysis of expanding the PGWWTP to 25.67 mgd ADWF.

Sources: City of Roseville 1996:2-10, 2-34 and 2-35; City of Roseville 2004:4.11-70 through 4.11-75; City of Roseville 2010:4.12.3-19; City of Roseville 2011:4.12.3-18; City of Roseville 2016:4.12-13; Placer County 2008a:2-26; RMC Water and Environment 2009:ES-4, ES-14, 3-5 and 3-6

Consistent with the text correction shown in Table 4.15-14, above, the text on page 4.15-67 of the Draft EIR is revised as follows:

Cumulative projects that would contribute demand for wastewater treatment at the PGWWTP include rezones and intensification within the regional service area boundary (including the West Roseville Specific Plan), Curry Creek Specific Plan, Regional University, Inviro Tech, Orchard Creek, Creekview Specific Plan, Sierra Vista Specific Plan, and Amoruso Specific Plan. Estimated buildout flows within the regional service boundary and the ultimate service area boundary are shown in Table 4.15-14. The Systems Evaluation for SPWA completed in 2009 assessed flows from these developments to plan for future wastewater treatment service needs. Table 4.15-14 is based on the flows assessed in the Systems Evaluation; however, revised flow estimates are provided where they have been updated. Excluding flows from the net SAP and PRSP areas, buildout ADWF for the SPWA regional service area boundary and ultimate service area boundary is estimated to be 21.96 mgd. The ADWF for buildout of the regional service area boundary and ultimate service area boundary including flows from the net SAP and PRSP areas is estimated to be ~~27.73~~ 27.75 mgd.

To provide a correction, the impact summary for Impact 4.15-7 on page 4.15-57 of the Draft EIR is revised as follows:

Impact 4.15-7: Increased demand for electricity

Implementation of the SAP, including the PRSP, would increase demand for electricity by bringing new residential and non-residential electricity users to the area. The increased demand for electricity could require additional electricity generation and transmission facilities, as well as the need for distribution infrastructure. PG&E has existing and planned substations in the SAP area that would have sufficient capacity to serve the new development in the net SAP and PRSP areas. Distribution infrastructure would be installed concurrently with net SAP and PRSP development, thereby reducing potential environmental impacts. Pioneer Community Energy recognizes the additional electric generation service needed to service the increased demand. The impact would be **less than significant**.

To provide a correction, the following new text is added to page 4.15-58 of the Draft EIR immediately preceding the section “Other Supporting Infrastructure”:

Pioneer Community Energy expects to increase its supply portfolio to meet the increased demand for electric generation service. The increase in the electric generation supply portfolio will be incrementally adjusted commensurate with increased demand. The impact would be less than significant.

To provide a correction, the conclusion paragraph on page 4.15-59 of the Draft EIR is revised as follows:

Conclusion

While buildout of the net SAP area and PRSP area would generate demand for electricity, PG&E's existing and planned facilities would have capacity to serve development, and Pioneer Community Energy has the ability to accommodate additional demand for electric generation service. Backbone infrastructure and distribution systems would also be required for new development and would be installed concurrently with new development. Because existing and planned capacity and infrastructure would be adequate to serve buildout of the net SAP area and PRSP area, this impact would be **less than significant**.

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**.

To provide a correction, Cumulative Impact 4.15-18 on page 4.15-70 of the Draft EIR is revised as follows:

Cumulative Impact 4.15-18: Cumulative increase in demand for electricity

As discussed in Impact 4.15-7, PG&E has adequate capacity and infrastructure to serve the electricity demands of development in the net SAP and PRSP areas, as well as other development in the area. Population increases associated with the more than 100,000 new residential units resulting from cumulative projects would be relatively slow, allowing for PG&E to construct additional infrastructure as necessary to meet demand. As electric generation service provider, Pioneer Community Energy has adequate supply to serve the electric generation demands of development in the net SAP and PRSP areas, as well as other development in the area. As part of the approval process for individual projects, project proponents would be required to provide proof from PG&E and Pioneer Community Energy that the development would be served by the ~~utility~~ utilities. With compliance with County requirements for obtaining will-serve letters, development in the net SAP and PRSP areas would not result in a considerable contribution to a cumulative impact related to increased demand for electricity. The impact would be **less than significant**.

2.1.20 Revisions to Section 4.16, “Energy”

To provide a correction, the first three paragraphs on page 4.16-2 of the Draft EIR are revised as follows:

Energy Service in the SAP Area

Electric transmission and delivery service and natural gas services in Placer County are provided by Pacific Gas and Electric Company (PG&E). Electric generation and related services in Placer County are provided by Pioneer Community Energy. PG&E would provide the project area, with electric transmission and delivery service and natural gas service. Pioneer Community Energy would provide the project area with electric generation and related service. Information regarding existing electric and natural gas facilities in the project area is provided in Section 4.15, “Utilities.”

Energy Types and Sources

California relies on a regional power system composed of a diverse mix of natural gas, petroleum, renewable, hydroelectric, and nuclear generation resources. One-third of energy commodities consumed in California is natural gas. In 2014, approximately 35 percent of natural gas consumed in the state was used to generate electricity. Residential land uses represented approximately 17 percent of California’s natural gas consumption with the balance consumed by the industrial, resource extraction, and commercial sectors (EIA 2014).

Power plants in California meet approximately 68 percent of the in-state electricity demand, hydroelectric power from the Pacific Northwest provides another 12 percent, and power plants in the southwestern U. S. provide another 20 percent (EIA 2014). The contribution of in- and out-of-state power plants depends on the precipitation that occurred in the previous year, the corresponding amount of hydroelectric power that is available, and other factors. PG&E Pioneer Community Energy is the primary electricity supplier in Placer County. As of December 31, 2018, Pioneer Community Energy’s power supply content was 33

percent renewable, including biomass and biowaste, geothermal, eligible hydroelectric, solar and wind. As of 2015, PG&E was powered by 29.5 percent renewables, including biomass, geothermal, small hydroelectric, solar, and wind (CPUC 2017).

To provide a correction, the section “Alternative Fuels” on page 4.16-2 of the Draft EIR is revised as follows:

Alternative Transportation Fuels

On-road vehicles use about 90 percent of the petroleum consumed in California. Caltrans projected that 237 million gallons of gasoline and diesel were consumed in Placer County in 2015, which represents an increase of approximately 26 million gallons of fuel from 2010 levels, following a general trend of approximately a 2 percent increase in fuel consumption per year (Caltrans 2008).

To provide a correction, the section “Energy Use for Transportation” on page 4.16-3 of the Draft EIR is revised as follows:

ENERGY USE FOR TRANSPORTATION

On-road vehicles use about 90 percent of the petroleum consumed in California. Caltrans projected that 237 million gallons of gasoline and diesel were consumed in Placer County in 2015, which represents an increase of approximately 26 million gallons of fuel from 2010 levels, following a general trend of approximately a 2 percent increase in fuel consumption per year (Caltrans 2008).

To provide a correction, the section “State of California Energy Plan” on page 4.16-4 of the Draft EIR is revised as follows:

State of California Energy Plan

CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The current plan is the 1997 California Energy Plan. The plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies strategies such as aiding public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs, and encouraging urban design that reduces vehicle miles traveled (VMT) and accommodates pedestrian and bicycle access.

The California Public Utilities Commission (CPUC) is responsible for implementing, overseeing and regulating compliance with certain statewide energy goals and policies, including the state’s integrated resource plan (IRP) and the renewable portfolio standard (RPS).

To provide a correction, the following new text is added to page 4.16-5 of the Draft EIR immediately following the section entitled “Senate Bill 350...” and preceding the section entitled “Assembly Bill 1007...”:

Senate Bill 100: The 100 Percent Clean Energy Act of 2018

In 2018, SB 100 was passed into law which accelerated and increased the RPS requirements specified in SB 350. As a result, load serving entities, including community choice aggregators, must increase their RPS requirement to 50 percent by the end of 2026, 60 percent by the end of 2030. Pioneer Community Energy is subject to both SB 350 and SB 100.

To provide a correction, the following new text is added to page 4.16-8 of the Draft EIR immediately preceding Section 4.16.4, “Analysis, Impacts, and Mitigation”:

Pioneer Community Energy

Placer County is a member entity of Pioneer Community Energy. As a community choice aggregator, Pioneer Community Energy is required to comply with SB 350, 100, 1078, and 32 and other related legislative and regulatory requirements. Pioneer Community Energy has an IRP and maintains an energy supply portfolio in compliance with RPS requirements.

To provide a revision to SAP Policy NR-6.7, the seventh bullet on page 4.16-11 of the Draft EIR is revised as follows:

- ▲ **Policy 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.

To provide a correction, Cumulative Impact 4.16-3 on page 4.16-22 of the Draft EIR is revised as follows:

Cumulative Impact 4.16-3: Cumulative wasteful and inefficient consumption of energy

Several other currently planned and approved projects identified in Table 4.0-2 would also receive electricity and natural gas service provided by PG&E and Pioneer Community Energy. These projects would also consume energy related to transportation and construction. These projects would be required to implement energy-efficiency measures in accordance with Title 24 to reduce energy demand. Given the large amount of development identified in the region, it is possible that even with implementation of Title 24 measures, inefficient and wasteful energy consumption could occur.

2.1.21 Revisions to Chapter 5, “Other CEQA-Mandated Sections”

To provide a minor correction to the list of significant and unavoidable impacts to reflect the correct impact conclusion for Impact 4.1-2 (which is correctly identified in Section 4.1, “Aesthetics,” of the Draft EIR), the bulleted list that begins on page 5-1 of the Draft EIR is revised as follows:

Aesthetics

- ▲ Impact 4.1-2: Substantial degradation of the existing visual character or quality of the site and its surroundings after buildout
- ▲ Impact 4.1-3: New source of substantial light or glare that would adversely affect daytime or nighttime views in the area during construction

2.1.22 Revisions to Chapter 6, “Project Alternatives”

In response to comment 31-10 as well as a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Table 6-1 on pages 6-4 and 6-5 of the Draft EIR is revised as follows:

Table 6-1 Project Development at Buildout			
Land Use Type	PRSP Area	Net SAP Area	Total Project Area
Single-Family Residential ¹	3,082 du	2,460 0 du	5,542 3,082 du
Age-Restricted Residential	1,050 du	0 du	1,050 du
Multifamily Residential ²	1,504 du	0 2,458 du	1,504 3,962 du
Retail ³	1,640 ksf	220 ksf	1,860 ksf
Office ⁴	1,241 ksf	1,110 ksf	2,351 ksf
Industrial ⁵	1,658 ksf	11,440 ksf	13,098 ksf
Innovation Center/R&D ⁶	901 ksf	12,000 ksf	12,901 ksf
Entertainment Mixed Use	0 ksf	3,060 ksf	3,060 ksf
University	30,000 students	0 students	30,000 students
Public Facilities	10.3 ac	6.3 ac	16.6 ac
Parks/Open Space	69.8 ac	0.0 ac	69.8 ac
Preserve/Mitigation Areas ⁷	264.8 ac	2,263.8 ac	2,528.6 ac

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

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

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

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

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

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

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

⁷ Does not include open space acreage within Sac State-Placer Center site.

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

As shown above, the County revised the proposed amendment to the General Plan landfill buffer policy to eliminate the newly proposed allowance of residential uses within 1,000 feet of the landfill with approval of a specific plan, master plan, or development agreement and replace it with a requirement that all new residential development proposed between 1 mile and 2,000 feet of any solid waste disposal site property boundaries requires approval of a specific plan, master plan, or development agreement. To reflect this change, page 6-6 of the Draft EIR is revised as follows:

- Land Use:** The proposed project includes an amendment to the County General Plan Policy 4.G.11, which would reduce the buffer around the WRSL from 1 mile (5,280 feet) to 2,000 feet for residential development, ~~or 1,000 feet~~ with the approval of a specific plan, master plan, or development agreement. This proposed General Plan amendment could result in land use incompatibility due to residential development occurring closer to the WRSL in areas that would otherwise remain undeveloped under the current residential buffer policy. Based on review of existing data regarding nuisance complaints from residents beyond 1 mile, it is expected that

new residents and users within the project area would complain about odor from the WRSL and that the number of complaints lodged about nuisance odors would increase. Such complaints could create pressure for the Western Placer Waste Management Authority (WPWMA) to implement additional odor control and reduction measures at the WRSL and, absent measures to control odors at the source and/or at receptors, could interfere with the ability of the landfill to expand or modify needed operations. As described in detail in Section 4.3, "Air Quality," measures available to Placer County to mitigate odor impacts would be infeasible, but feasible measures are available to WPWMA including revised composting methods, minimizing use of fines as alternative daily cover, and appropriate and timely handling of sludge waste. 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. 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. Therefore, this impact would be **significant**.

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.

2.1.23 Revisions to Chapter 7, “List of Preparers”

No revisions are needed.

2.1.24 Revisions to Chapter 8, “References”

The following new references are added to Chapter 8, “References,” under the subheading, Section 4.3, “Air Quality,” of the Draft EIR as follows:

Baral, Robin R. Churchwell White, LLP, Sacramento, CA. August 22, 2019—memorandum to Clayton Cook of the Office of Placer County Counsel regarding Odor Mitigation for the Sunset Area Plan/Placer Ranch Specific Plan EIR (State Clearinghouse No. 2016112012). Sent on behalf of the Western Placer Waste Management Authority.

Placer County Air Pollution Control District. 2016 (October). *California Environmental Quality Act Thresholds of Significance. Justification Report*. Available: <http://www.placerair.org/landuseandceqa/ceqathresholdsandreviewprinciples>. Accessed August 2019.

Schmidt, CE and TR Card. 2019 (August 2). Technical Report #2: Odor Mitigation Measures Related to Proposed Development within the WRSB Buffer Zone. Letter memorandum to Robin Baral of Churchwell White, LLP, Red Bluff, CA.

2.1.25 Revisions to Appendices

The Draft EIR included as Appendix H the May 2017 versions of the Placer Ranch utilities master plans (i.e., Potable Water Master Plan, Recycled Water Master Plan, Sewer System Master Plan, Storm Drainage Master Plan, and Dry Utilities Plan). The current versions of these plans are dated July 2017. The July 2017 versions are included as Appendix A through F to this Final EIR. The changes between the May 2017 versions and the July 2017 versions are very minor. Also, the Draft EIR included as Appendix P several technical memoranda that provided updates to the Placer Ranch utilities master plans. Each technical memorandum included in Appendix P corresponds to one of the Placer Ranch utilities master plans. The Draft EIR relied on the updated data from these technical memoranda; however, this confused some commenters who pointed out that the Draft EIR data was not consistent with the data presented in the utilities master plans. To provide clarity, each of the technical memoranda is included with its corresponding utilities master plan in Appendices A through F.

Appendix K of the Draft EIR did not include the detailed calculations for the Off-Site Mitigation Fee Program that are discussed in Mitigation Measure 4.7-2b. These calculations are provided in the Final EIR as Appendix H.