

## 3 RESPONSES TO COMMENTS ON THE DRAFT EIR

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

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

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

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

### 3.1 MASTER RESPONSES

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

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

#### 3.1.1 Master Response 1: Alternatives Analysis

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

### ADEQUACY OF ALTERNATIVES ANALYSIS

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

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

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

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

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

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

## ALTERNATIVES ANALYSIS

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

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

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

## ENVIRONMENTALLY SUPERIOR ALTERNATIVE

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

## REASONABLE RANGE

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

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

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

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

## CONSIDERATION OF ALTERNATIVES BY PLACER COUNTY BOARD OF SUPERVISORS

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

## REVISIONS TO THE DRAFT EIR

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

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

### Aesthetics

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



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

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

### **Biological Resources**

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

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

### **Biological Resources**

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

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

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

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

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

### **Transportation and Circulation**

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

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

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

## **3.1.2 Master Response 2: Citizen-Initiated Smart Growth Plan**

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

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

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

## CITIZEN-INITIATED SMART GROWTH PLAN

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

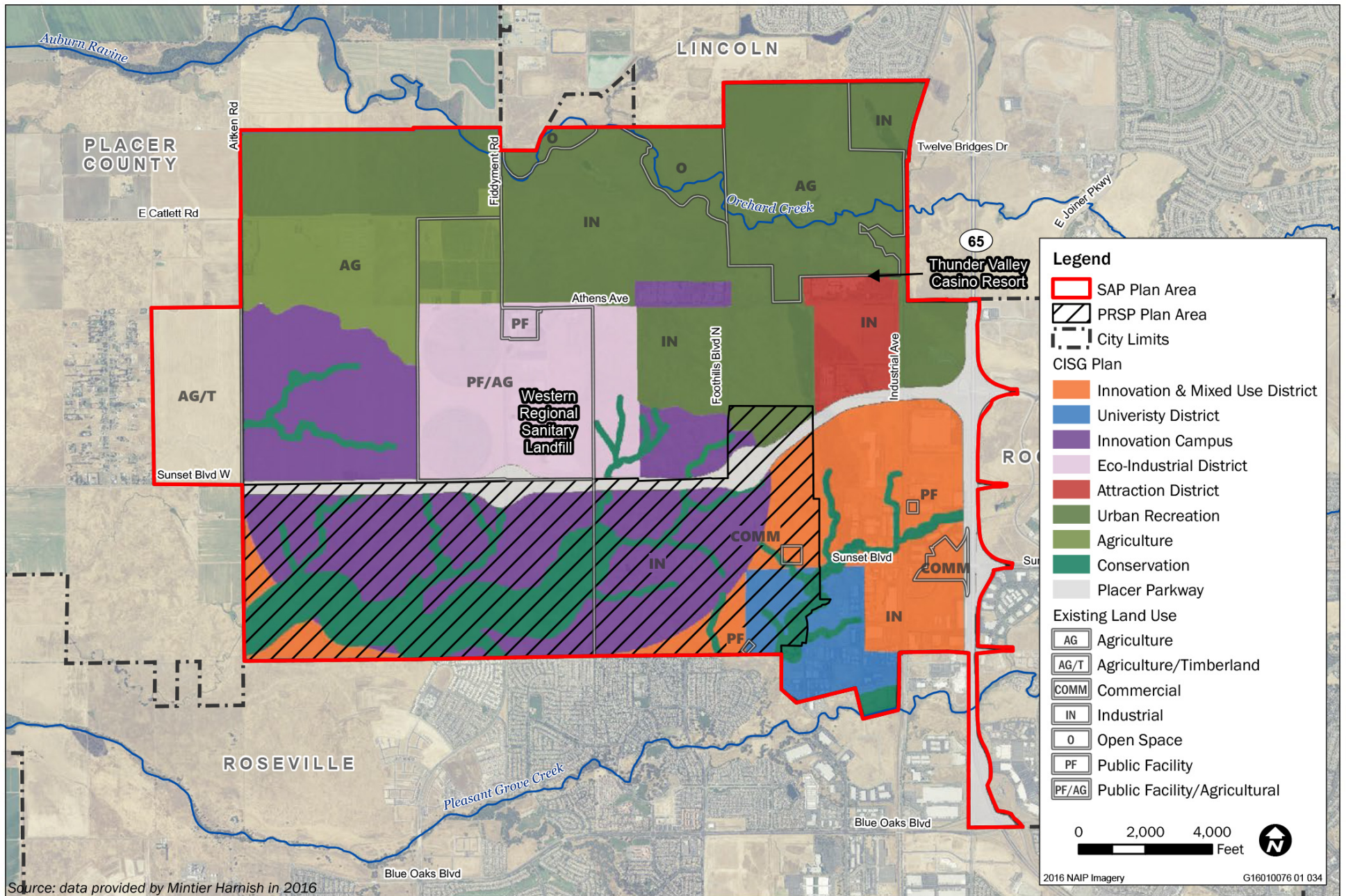
The CISGP appears to employ three primary strategies for reducing environmental impacts, which can be summarized as follows:

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

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

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

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



Source: data provided by Mintier Harnish in 2016

**Exhibit 3-1**



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

## COMPARISON OF CISGP TO SAP/PRSP

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

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

	SAP/PRSP (Numbers from Draft EIR)	SAP/PRSP (Numbers from CISGP)	CISGP	Difference (CISGP minus SAP/PRSP)
Population Added	19,314	17,367	84,080	64,766
Jobs Added	55,760	192,879	151,463	95,703
Housing Units	8,094	8,950	49,614	41,520
Jobs-to-Housing Ratio	6.88	21.55	3.05	-3.83
Sources: Placer County 2018; AEL 2019				

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

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

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

	SAP/PRSP (Numbers from Draft EIR)	SAP/PRSP (Numbers from CISGP)	CISGP	Difference (CISGP minus SAP/PRSP)
<b>Agriculture</b>				
Agriculture	–	–	484 acres	484 acres

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

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

<sup>2</sup> Includes entertainment/mixed-use.

<sup>3</sup> Assumed to include R&D uses.

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

<sup>5</sup> From Draft EIR Table 4.13-10.

Sources: Placer County 2018; AEL 2019

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

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

## SACOG BLUEPRINT AND MTP/SCS CONSISTENCY

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

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

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

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

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

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

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

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

## **JOBS-HOUSING BALANCE**

The CISGP seeks to create an internally focused jobs-to-housing balance and also aims to increase energy efficiency and promote transit opportunities by increasing density and intensity of urban development. Regarding the jobs-to-housing balance, an internally balanced jobs-to-housing ratio does not provide benefit if it does not consider the context of the regional jobs-to-housing ratio. While the CISGP would result in an internal jobs/housing balance, the CISGP does not help the jobs/housing balance in the project vicinity, which is more housing heavy. As explained in the Draft EIR (page 4.12-5), the market analysis prepared for the SAP noted that prevailing literature shows that a jobs to housing ratio of 1.5 is ideal (Economic & Planning Systems, Inc. [EPS] 2015:42). In 2012, the South Placer area had approximately 1.31 jobs for every housing unit, indicating that South Placer should add more employment opportunities to strike a better balance (EPS 2015:42). More specifically, the Draft EIR (page 4.12-13) states while the Cities of Rocklin and Roseville have ratios of 1.24 and 1.22, respectively, the overall ratio for the whole of Placer County is 1.08. Looking strictly at the numbers for project buildout, the project would add substantially more jobs than housing units, making it a “jobs-rich” area. However, viewed in the context of all of Placer County, the project’s contribution would serve to provide more balance to Placer County. As stated in the Draft EIR (page 4.12-11), if the proposed project were built out today, it would increase the unincorporated county’s jobs-to-housing ratio from 1.08 to 1.36, which is generally considered balanced. Conversely, by maintaining an internally balanced jobs-to-housing ratio, the CISGP does not help balance the existing jobs-to-housing ratio in the region.

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

## **FEASIBILITY OF CISGP**

### **Market Feasibility**

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



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

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

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

Housing markets reflect a myriad of conditions related to both demand and supply. Demand for housing is determined by various factors, including housing prices; population (size of the market); household income; employment opportunities; transportation options and costs; interest rates; availability of credit; a long-term economic outlook; and other factors. Housing supply is similarly affected by a number of different factors, including housing cost, land value, landowner expectations and preferences, government regulations, availability of financing, and other factors.

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

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

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

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

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

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

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

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

### **CISGP University Feasibility**

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

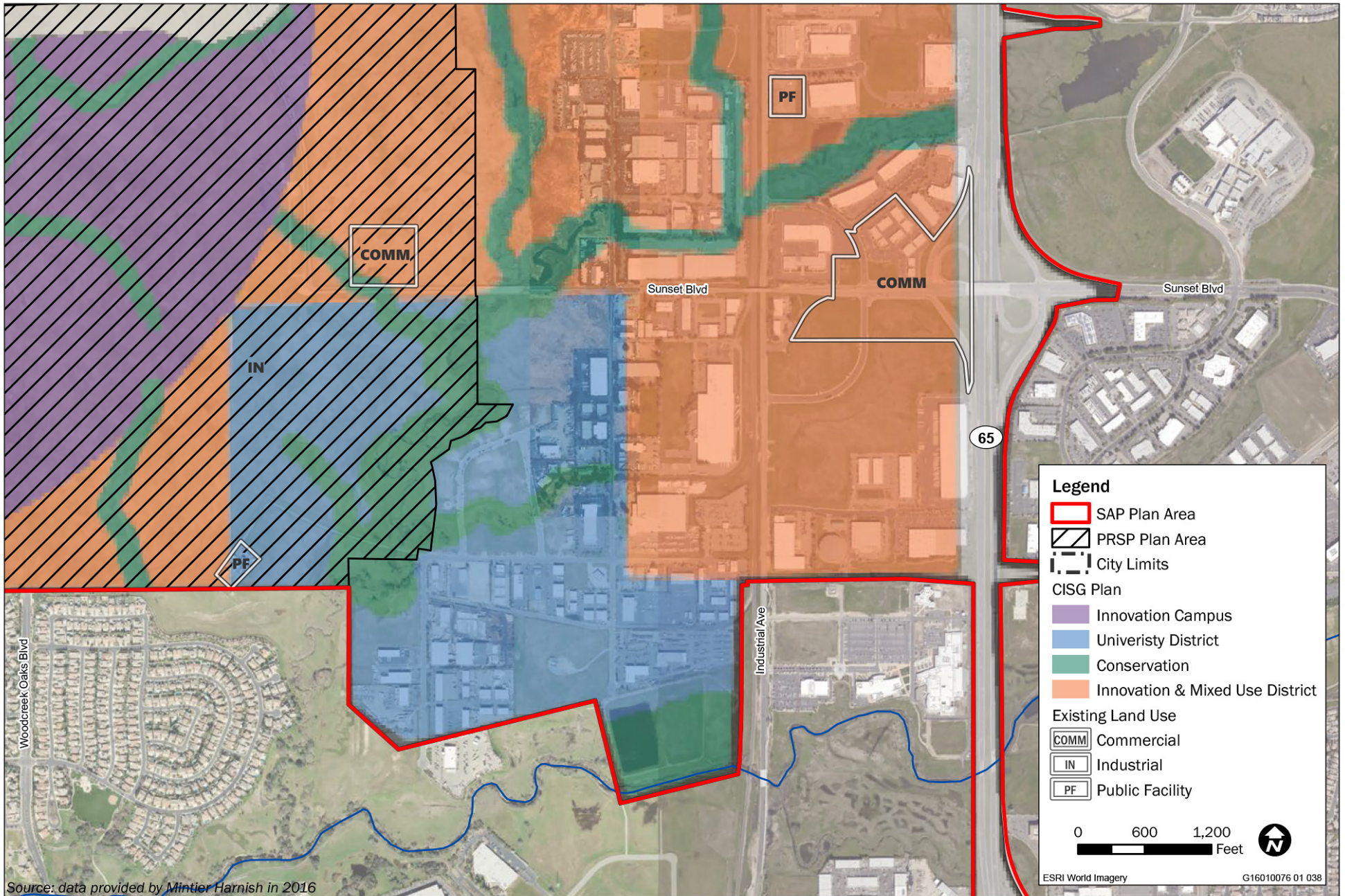
The second feasibility issue related to the CISGP's University District location is that it encompasses a substantial area of land that is already developed. See Exhibit 3-2. In order to develop these properties with university uses, the existing structures and infrastructure would need to be either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

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

### **One-Mile Landfill Buffer Feasibility**

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

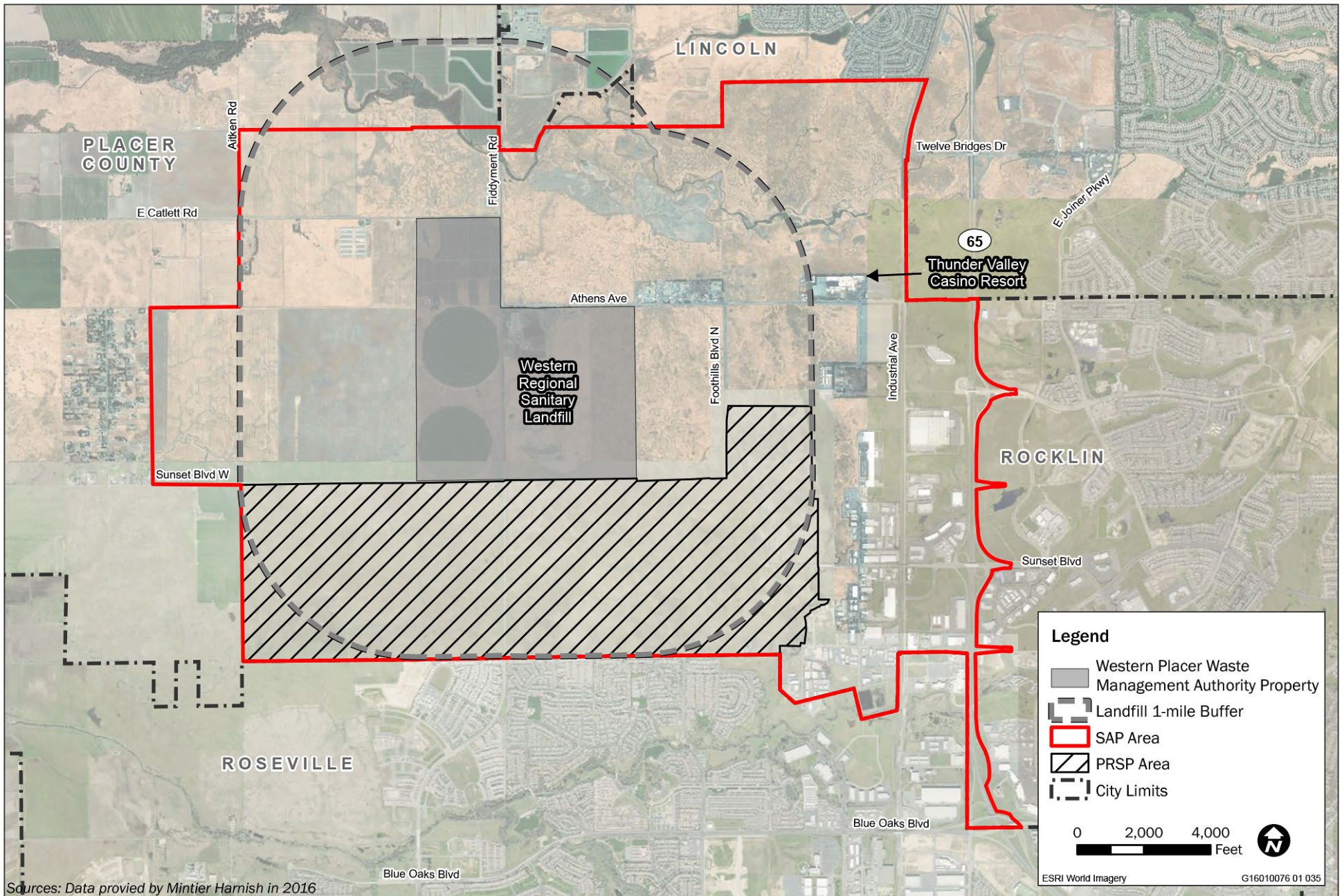




**Exhibit 3-2**

**Existing Structures within CISGP University District**





**Exhibit 3-3**

**One-Mile Landfill Buffer**



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

## EFFECTIVENESS OF IMPACT REDUCTION

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

### Reduction of Farmland Impacts

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

### Reduction of Odor Impacts

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

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

### Wetlands Impacts

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

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

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

	SAP/PRSP (Numbers from Draft EIR)	SAP/PRSP (Numbers Assumed in CISGP)	CISGP	Difference (CISGP minus SAP/PRSP)
Acres of Direct Impact on Wetlands	2,617 <sup>1</sup>	3,923/3,515 <sup>2</sup>	3,753/2,942 <sup>2</sup>	1,136/898 <sup>2</sup>
<sup>1</sup> Combined total from Draft EIR Tables 4.4-4 and 4.4-5 "Acres of Direct Impact" column. This total includes all aquatic resource types, not just vernal pools.				
<sup>2</sup> The CISGP identifies two different sources for their totals: County Vernal Pool Map and Whitham & Vollmar Vernal Pool Map. The numbers identified from both sources are presented.				
Sources: Placer County 2018; AEL 2019				

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

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

## GHG and Air Quality Impacts

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



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

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

Notes: N/A = not available; NO<sub>x</sub> = oxides of nitrogen; PM<sub>10</sub> = respirable particulate matter; PM<sub>2.5</sub> = fine particulate matter; SO<sub>x</sub> = sulfur oxide; CO = carbon monoxide; ROG = reactive organic gas; GHG = greenhouse gas = MTCO<sub>2e</sub>/year = metric tons of carbon dioxide equivalent per year.

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

Sources: Placer County 2018; AEL 2019

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

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

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

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

## Vehicle Miles Traveled

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



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

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

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

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

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

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

Sources: Placer County 2018; AEL 2019

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

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

## UTILITIES AND PUBLIC SERVICES

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

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

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

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

## **CISGP AS A PROJECT ALTERNATIVE**

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

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

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

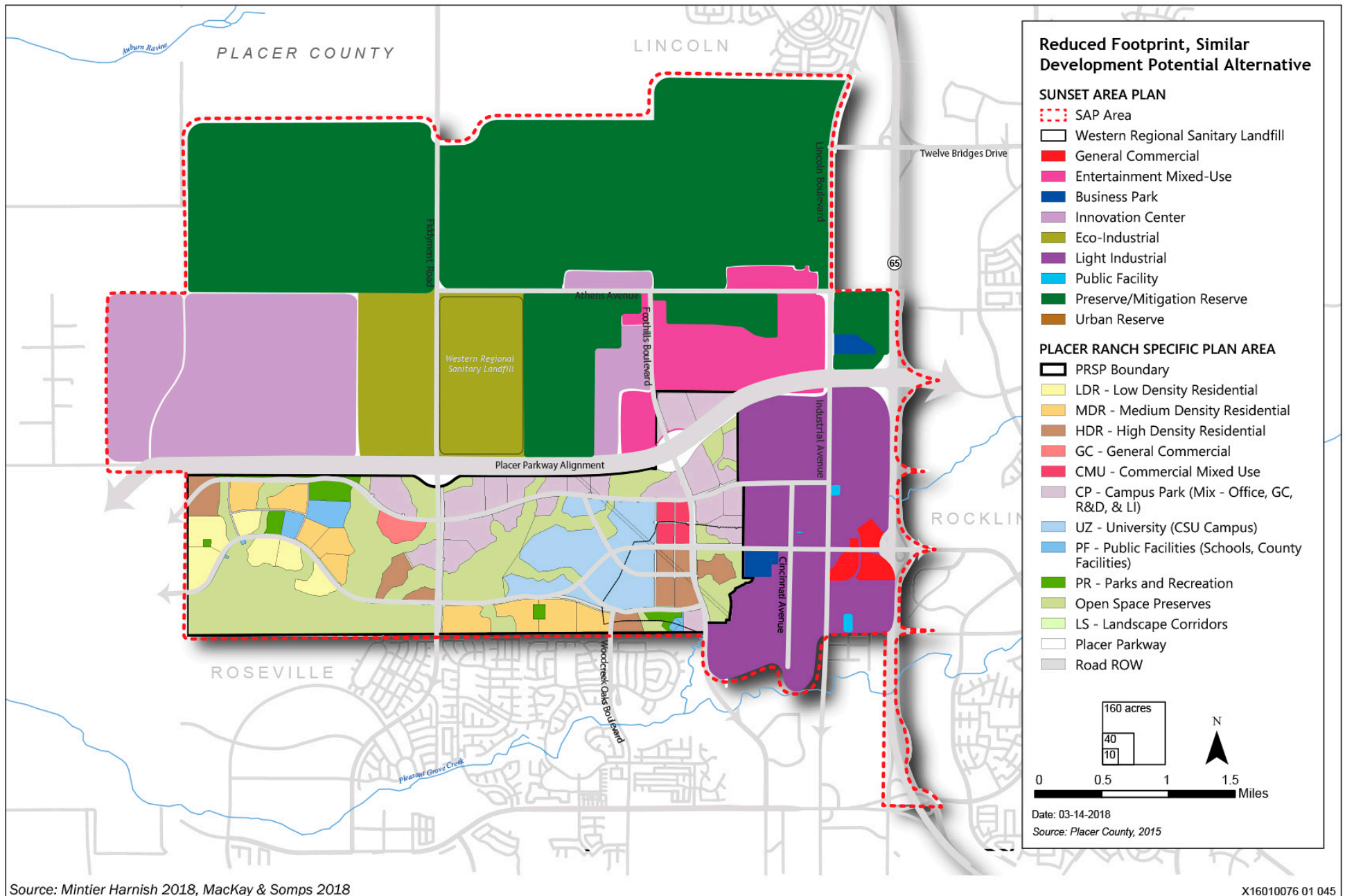
The Draft EIR indicates that Alternative 4 would remove nearly 1,500 acres of developable land from the project area. The combined development area of the SAP/PRSP would be approximately 5,500 acres. (Note that the development area for the SAP area cannot be accurately estimated because SAP policies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

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

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

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

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



**Exhibit 3-4**

**Alternative 4: Reduced Footprint, Similar Development Potential**

### 3.1.3 Master Response 3: Placer County Conservation Program and Mitigation

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

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

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

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

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

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

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

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

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

The Draft EIR provides participation in the PCCP as an option for permitting and mitigating project impacts on biological resources covered under the PCCP should it be adopted and available, by the time future projects are implemented. Participation in the PCCP would be the preferred mitigation approach and is required under SAP policy and PRSP development standards, if it is available when individual projects are implemented, because it provides a comprehensive landscape-level approach to conservation that would result in a large, interconnected preserve system to better ensure long-term survival and protection of covered species and habitat. However, the Draft EIR does not rely solely on the PCCP for impact mitigation; there are optional mitigation measures and front-loaded policies and programs, presented under the heading “Proposed Sunset Area Plan Goals and Policies” beginning on page 4.4-31 of the Draft EIR, that mitigate the project’s potential impacts on biological resources in the event the PCCP, including the Western Placer CARP and associated U.S. Army Corps of Engineers programmatic permits, are not adopted or are not available as a permitting and mitigation strategy for future projects.

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

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

- ▲ Policy NR-2.4: Stream Habitat Mitigation,
- ▲ Policy NR-2.5: Setback Area Protection and Maintenance,
- ▲ Policy NR-3.1: Sensitive Habitat Buffers,
- ▲ Policy NR-3.3: Stream Corridor Encroachment,
- ▲ Policy NR-3.4: Stream Corridor Natural Conditions,
- ▲ Policy NR-3.5: Stream Protection Best Management Practices and Low Impact Development,
- ▲ Mitigation Measure 4.4-1a: Compensate for loss of aquatic resources, and
- ▲ Mitigation Measure 4.4-6a: Avoid, minimize, or compensate for loss of riparian habitat.

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

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

Therefore, alternative mitigation is presented for each biological resource impact in the event the PCCP is not available as a mitigation strategy. In most cases, these mitigation measures, like participation in the PCCP, would reduce significant impacts to a less-than-significant level. SAP policies and Mitigation Measures 4.4-1a, 4.4-1b, 4.4-3a, 4.4-3b, and 4.4-3c are expected to reduce significant impacts on wetlands and other waters of the United States, waters of the state, and federally listed vernal pool invertebrates, but not necessarily to a less-than-significant level. While these measures would result in "no net loss" of overall wetland acreage, there may not be enough mitigation bank credits available on the market to fully offset the loss of wetland functions resulting from project implementation, and it is unknown if sufficient land would be available from willing sellers to fully mitigate the loss. Therefore, as described in the Draft EIR, these impacts would remain significant and unavoidable. If the PCCP is approved by the state and federal agencies and is adopted and implemented in time to support development within the PRSP and net SAP areas, it would likely reduce significant impacts to a greater degree than project-by-project mitigation by developing a large, managed and monitored reserve area that will provide wetland and species habitat restoration, open space and agricultural conservation in perpetuity, rather than smaller, more fragmented and isolated reserves surrounded by urban development.

### 3.1.4 Master Response 4: Odors

#### ODOR IMPACT THRESHOLDS OF SIGNIFICANCE

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

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

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

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

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

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

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

## ODOR CONTROL MITIGATION

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

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

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



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

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

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

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

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

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

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

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

**Table 3-6 Authority-Recommended Odor Mitigation Measures**

Measure	Capital Cost	Annual Cost
Tier 1 Measures: Composting Operations		
Aerated Static Piles	Authority funded	Authority funded
Compost Best Management Practices	\$0.00	\$100,000
Annual Odor Emissions Testing	\$0.00	\$100,000
Mixing Building with Biofilter Scrubber	\$2,000,000	\$0.00
Tier 2 Measures: Composting Operations		
ASP on Cured Compost	\$2,500,000	\$0.00
Improved Pond Aeration	\$200,000	\$10,000
Odor Testing and Operational Revisions	\$0.00	\$100,000
Tier 1 Measures: Landfill Operations		
Odor Neutralizers for Sorted Refuse	\$200,000	\$120,000
Odor Neutralizers for the Active Landfill Face	\$200,000	\$120,000
Landfill BMPs	\$0.00	\$100,000
Increased Screening	\$0.00	\$200,000
Enhanced Landfill Gas Collection	\$0.00	\$200,000
Tier 2 Measures: Landfill Operations		
Posi-Shell Landfill Cover	\$0.00	\$200,000
Odor Neutralizer for Continuous Cover of the Active Landfill Face	\$0.00	\$200,000
Additional Landfill Gas Monitoring	\$0.00	\$50,000
Tier 1 Measures: Site-wide Technologies and Operations		
Enhanced Monitoring/Modeling	\$200,000	\$0.00
Odor Hotline/Community Outreach	\$20,000	\$100,000
Tree Planting and Maintenance	\$500,000	\$25,000
Sources: Technical Report #2, prepared by CE Schmidt and TR Card on August 2, 2019; R. Baral, personal communication, August 22, 2019		

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

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

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

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

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

The SAP development standards will be augmented to require:

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

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

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

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

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

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

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

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

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

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

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

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

### **Mitigation Measures**

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

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

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

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

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

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

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

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

- ~~**Immediately Cover or Bury Sludge Waste.** To reduce odors associated with sludge received by WWSL 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 WWSL odors by up to 90 percent compared to the existing baseline and up to 50 percent compared to estimated odors in 2058. However, the State CEQA Guidelines state that "[m]itigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments" (Section 15126.4[a][2]). Because direct implementation of the actions listed in Mitigation Measure 4.3-6a are beyond the jurisdiction of Placer County, they are infeasible for the County to implement. Fair-share contribution to such measures is the County's responsibility to enforce, however, and Mitigation Measure 4.3-6b would require a monetary contribution by Placer Ranch Specific Plan proponents and by future net SAP area developments to WPWMA for their odor impacts, and participation by other



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

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

## LAND USE COMPATIBILITY

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

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

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

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

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

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

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

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

### **Mitigation Measures**

As described in detail in Section 4.3, “Air Quality,” Mitigation Measure 4.3-6a and Mitigation Measure 4.3-6b are available to mitigate odor impacts. Mitigation Measure 4.3-6a outlines measures proposed by WPWMA that should be implemented at the WRS 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 WRS and MRF, including composting operations. Such measures include revised composting methods, minimizing use of fines as alternative daily cover, and appropriate and timely handling of sludge waste (see Mitigation Measures subsection of Impact 4.3-6, Create objectionable odors affecting a substantial number of people).

As described on Draft EIR page 4.10-18, even with implementation of Mitigation Measure 4.10-2, impacts would remain significant because the “measure would not eliminate the source of the odor or any of the factors that contribute to intensification or range of perception of odor depending on circumstances, such as wind, temperature inversions, specific operating methods and amount/type of waste.” Impact 4.10-2 would therefore remain significant and unavoidable. In addition, as described above, Mitigation Measure 4.3-6a is infeasible for Placer County to implement, and while Mitigation Measure 4.3-6b would serve to lessen the significant and unavoidable environmental impacts of the project, the nature, degree and effectiveness of

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

**Significance after Mitigation**

Mitigation Measure 4.10-2 would require implementation of measures in new development pursuant to proposed specific plans, master plans, or development agreements that would reduce perception of odor inside new structures and, to a lesser extent, outside new structures. These measures would potentially aide in increasing land use compatibility in the PRSP. However, this measure would not eliminate the source of the odor or any of the factors that contribute to intensification or range of perception of odor depending on circumstances, such as wind, temperature inversions, specific operating methods, and amount/type of waste. Mitigation Measure 4.3-6a and Mitigation Measure 4.3-6b are also available for reducing odors at the WRSL. However, Mitigation Measure 4.3-6a is infeasible for the County to implement, and while Mitigation Measure 4.3-6b would serve to lessen the significant and unavoidable environmental impacts of the project, the nature, degree and effectiveness of odor control measures that may ultimately be implemented are unknown. Therefore, this impact would be **significant and unavoidable**.

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

## EFFECTS ON WESTERN REGIONAL SANITARY LANDFILL OPERATION

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

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

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

SAP Policy LU/ED-6.3 states:

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

SAP Policy NR-5.7 states:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## ODOR IMPACTS AND EFFECTS ON PCAPCD OPERATION

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

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

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

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

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

### 3.1.5 Master Response 5: Greenhouse Gas Mitigation

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

#### SUGGESTED GHG MITIGATION ALREADY INCLUDED IN DRAFT EIR

##### Transportation-Related GHG Mitigation Measures

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

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

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

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

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

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

There are several policies identified under the SAP that would require the project to contribute funding to local and regional transit agencies. These include the following measures:

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

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

- Mitigation Measure 4.14-13a, on page 4.14-92 of the Draft EIR, states, “The County shall prepare a transit master plan for the SAP area, including the PRSP area.” This mitigation measure includes potential coordination with Placer County Transportation Planning Agency and Roseville Transit.
- Mitigation Measure 4.14-13b, on page 4.14-92 of the Draft EIR, states that “a Community Service Area (CSA) Zone of Benefit (ZOB) shall be established by the project proponent, or the project proponent shall annex into an existing CSA ZOB to fund the cost of transit services proposed by the Transit Master Plan. This will include any related capital costs for buses, passenger amenities, and facilities.”

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

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

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

### **Energy-Related GHG Mitigation Measures**

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

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

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

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



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

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

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

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

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

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

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

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

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

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

Mitigation Measure 4.7-2a on page 4.7-21 of the Draft EIR requires “All project buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of the 2016 California Green Building Energy Code, Sections A4.106.5 and A5.106.11.2.” Thus, cool roofs would be included on all project buildings.

SAP Policy NR-5.9, “Cool Community Strategies,” states, “The County shall promote Cool Community Strategies to cool the urban heat island, reduce energy use and ozone formation, and maximize air quality benefits by requiring new development to implement four key strategies: plant trees, selective use of vegetation for landscaping, install cool roofing, and install cool pavements.”

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The following SAP policy addresses drought-resistant landscaping:

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

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

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

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

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

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

## **Water-Related GHG Mitigation Measures**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## SUGGESTED GHG MITIGATION TO BE ADDED TO THE DRAFT EIR

### Transportation-Related GHG Mitigation Measures

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

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

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

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

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

### Energy-Related GHG Mitigation Measures

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

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

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

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

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

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

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

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

## SUGGESTED GHG MITIGATION DEEMED INFEASIBLE

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

### Energy-Related GHG Mitigation Measures

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

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

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

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

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

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

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

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

## Transportation-Related GHG Mitigation Measures

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

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

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

## Other GHG Mitigation Measures

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

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

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

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

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

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

- ▲ **Consider using compacted crushed rock for trails. It's cheaper, faster, permeable, and produces less CO<sub>2</sub> emissions than concrete.**

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

### 3.1.6 Master Response 6: Drainage and Flooding

Several comments raise similar concerns related to the project's stormwater retention. The most common concern relates to the fact that the Pleasant Grove Retention Facility, although an approved project, is not designed with capacity to meet the project's need for volumetric stormwater retention, and that the Draft EIR identifies the Pleasant Grove Retention Facility for off-site stormwater retention. Comments suggest that it is inappropriate to identify a stormwater retention solution that is not approved. However, there appears to have been some confusion regarding the project's retention strategy described in the Draft EIR, which indicates that the Pleasant Grove Retention Facility is not the only option available to meet the project's stormwater retention needs. The Draft EIR states (page 3-26) that development in the SAP area would require stormwater volumetric retention as a means to minimize increased stormwater volumes that would otherwise reach the Sacramento River and that volumetric retention could be either on site or off site; however, off-site facilities on a regional scale would be more practical for the SAP, and several have already undergone some level of planning and design. Page 3-58 of the Draft EIR provides even further clarity indicating that retention is proposed to occur either on-site, in the existing City of Lincoln Lakeview Farms retention basin, or in a proposed retention basin that could be constructed on the Scilacci Farms property, for which the County is currently working to secure an easement. This easement has been secured since release of the Draft EIR. As such, the sixth paragraph on page 3-58 of the Draft EIR is revised as follows:

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



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

Other comments expressed concern related to the funding and timing of the Pleasant Grove Retention Facility relative to project implementation. The Draft EIR (page 3-58) states that using the facility would require a cooperative agreement between the City of Roseville and Placer County for basin construction and maintenance paid through a fee collected by the County or County/City or an equivalent mechanism that fully funds the project. At such time that adequate funds have been collected, facilities would be constructed with sufficient capacity to meet the project's stormwater retention needs as well as larger, regional needs. If the City and County are unable to memorialize a joint retention facility agreement, construction of equivalent retention facilities, whether on-site or off-site elsewhere, would be required. (Note that this EIR assumes that Pleasant Grove Retention Facility would be used for off-site retention; if a different off-site facility is needed for retention in the Pleasant Grove Creek watershed, additional CEQA review would be required.) Lastly, interim on-site retention facilities may be implemented for various projects in the SAP and PRSP areas unless or until the Pleasant Grove Retention Facility is operational or other permanent equivalent facilities are available for retention. The Draft EIR states (page 3-69): "To ensure that a mechanism is in place to fund construction of the project's proportionate share of retention at the City of Roseville's Pleasant Grove Retention Facility, a fee program (or equivalent mechanism) would be required, and fees would be collected by the County with each building permit. At such time that adequate funds have been collected, retention facilities would be constructed with sufficient capacity to meet the project's stormwater retention needs. If the City and County are unable to memorialize a joint-facilities agreement (or equivalent mechanism), construction of equivalent retention facilities, whether on-site or elsewhere off-site, would be required. Lastly, interim on-site retention facilities may be developed unless or until the Pleasant Grove Retention Facility is online, to fully accommodate the project's long-term stormwater volumetric requirements."

Some comments indicated that Pleasant Grove Retention Facility is not an approved project and requires CEQA evaluation. Other comments acknowledge that the Pleasant Grove Retention Facility is an approved project, but indicate that, due to the fact that it does not have adequate volumetric retention capacity to accommodate stormwater increases associated with the project, the expansion should be evaluated in the Draft EIR. The City of Roseville certified an EIR for the Pleasant Grove Retention Facility (City of Roseville Retention Basin Project EIR, State Clearinghouse Number 2000022007). See page 4-5 of the Draft EIR for more information. As explained on page 4-5, the Pleasant Grove Retention Facility, contemplated and analyzed at a project-level herein as a larger facility than that evaluated by the City of Roseville in 2002, would be expanded to provide needed stormwater volumetric retention for the SAP and PRSP areas and is included as part of the project. Although other alternatives are available, conveyance of project-site stormwater to this future expanded facility would best meet project objectives. The Draft EIR includes evaluation of impacts associated with the expanded Pleasant Grove Retention Facility. As described in Chapter 3 of the Draft EIR, "Project Description," the Pleasant Grove Retention Facility is being evaluated as part of the proposed project.

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

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

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

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

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

Section 15146(b) further states:

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

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

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

### 3.1.8 Master Response 8: Recirculation

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

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

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

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

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

### 3.1.9 Master Response 9: Mitigation and Development Fees

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

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

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

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

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

## 3.2 RESPONSES TO INDIVIDUAL COMMENTS

### 3.2.1 Agencies

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWS

#### DEPARTMENT OF TRANSPORTATION

##### DISTRICT 3

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

Letter  
1

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a California Way of Life.*

February 22, 2019

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

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

#### Sunset Area Plan/Placer Ranch Specific Plan Project

Dear Shirlee Herrington:

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

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

#### **Traffic Forecasting and Modeling**

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

1-1

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to enhance California's economy and livability"*

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are mainly focused on the PRSP project.

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

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

1-1  
cont.

### **Traffic Operations**

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

1-2

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

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

1-3

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

1-3  
 cont.

### **Hydraulics**

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

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

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

1-4

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

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

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properly maintain these systems in perpetuity.

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

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

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

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

Sincerely,



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

1-4  
 cont.

1-5

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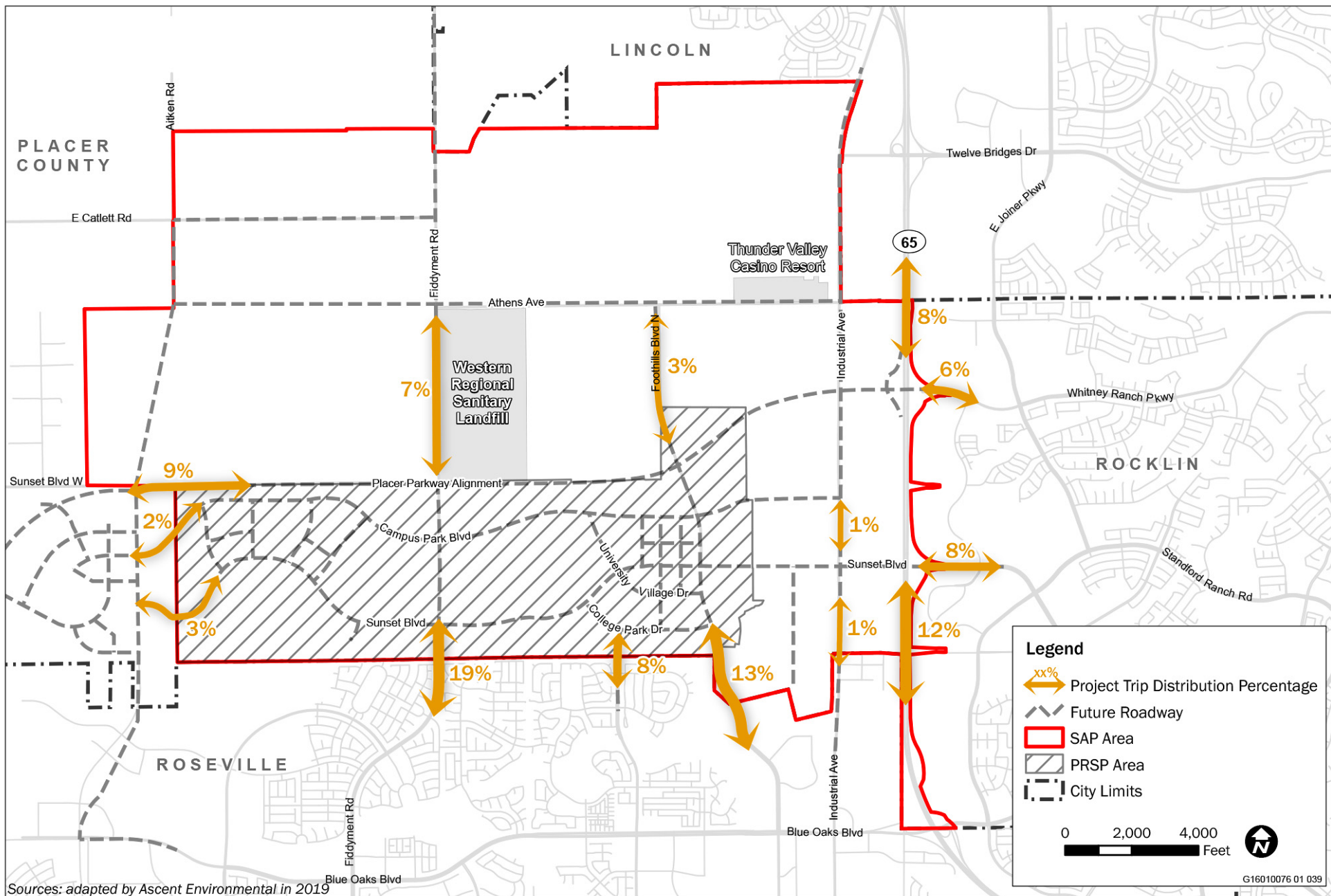
**Letter  
1**

California Department of Transportation  
Kevin Yount, Branch Chief, Office of Transportation Planning Regional Planning Branch—East  
February 22, 2019

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

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

- 1-2 The comment requests the project provide bicycle/pedestrian and bus facilities connecting to the Whitney Ranch Parkway area (i.e., on Placer Parkway). As described on pages 4.14-36 and 4.14-50 of the Draft EIR, Placer Parkway would provide transportation connections between the project and the Whitney Ranch Parkway area, and would serve vehicular modes, including transit. However, bicycle and pedestrian facilities are not consistent with the function and design of expressways, like Placer Parkway which has been discussed and agreed to by Caltrans during the Project Approval and Environmental Document (PA&ED) for Phase I of Placer Parkway. The County anticipates having 90 percent design plans this fall and is not including pedestrian facilities in the design consistent with prior approvals. Bicycle and pedestrian facilities that are consistent with County functional classification and design standards are provided on parallel roadways, such as Athens Avenue and Sunset Boulevard.
- 1-3 The comment describes the project's effect on SR 65 and suggests that the project contribute to a list of specific improvements along the SR 65 corridor. The project's impact to traffic operations on SR 65 is disclosed as Impacts 4.14-10 and 4.14-23 in the Draft EIR. Mitigation Measure 4.14-10 describes the project's contribution to improvements of SR 65, including potential auxiliary lanes and a mainline high occupancy vehicle (HOV) lane as identified in the comment. The improvements to the Whitney Ranch Parkway interchange identified in the comment are part of the Placer Parkway Phase I project, which is discussed on page 4.14-49 in the Draft EIR. The Sunset Boulevard interchange already has ramp meters installed.



**Exhibit 3-5**

**PRSP Area External Project Trip Distribution**

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

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

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

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

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

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

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

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

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

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

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



February 20, 2019

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

Letter  
2

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

Dear Ms. Jacobsen:

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

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

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

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

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

2-1

2-2

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

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

Page 2 of 2

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

2-2  
cont.

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

Sincerely,



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

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

*~ Lincoln, A City of Opportunity ~*



**Letter  
2**

City of Lincoln  
Matthew J. Wheeler, P.E., Community Development Director  
February 20, 2019

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



Letter  
3

February 22, 2019

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

Dear Ms. Chavez:

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

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

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

**A. Project Description**

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

3-1

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## B. Air Quality

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

### *Landfill Buffer Reduction*

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

### *Landfill / Odor Analysis*

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

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

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

3-1  
cont.

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

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

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

3-1  
cont.

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

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

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

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

3-1  
cont.

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

### C. Transportation/Circulation

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

3-2

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

3-3

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

3-4

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

3-5

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

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

3-6

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

- The City of Rocklin has no current interest in participating in additional sub-regional or regional approaches to mitigate transportation-related impacts beyond what we currently participate in given our near build-out status. The City evaluates transportation-related impacts from Rocklin development to facilities outside of Rocklin through the CEQA process, and if significant impacts to such facilities are identified, mitigation measures are also identified.

3-6  
cont.

- *Adherence to City of Rocklin General Plan Policy C-10*

The City of Rocklin's Level of Service Policy is presented in the DEIR, however, it should be noted that under Policy C-10(C) impacts created by development in another jurisdiction are to restore the LOS in Rocklin back to "C" unless it is determined by the Rocklin City Council and not another entity that the mitigation is infeasible. In cases where impacts are created by development in an adjacent jurisdiction, mitigation is to be implemented to the fullest extent practicable as determined by the City Council.

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

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

3-7

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

3-8

- *Global Comment – Traffic Mitigation Measures/Secondary Impacts*

CEQA requires identification of the impacts created by proposed mitigation measures. In areas where widening, lane additions or other reconfigurations are suggested to

3-9

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

3-9  
cont.

- *Pacific Street / Sunset Boulevard*

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

3-10

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

3-11

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

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

3-12

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

3-12  
cont.

#### 8. Traffic Associated With Entertainment Venues and Theme Parks

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

3-13

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

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

3-14

#### D. Public Safety

##### *Fire*

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

3-15



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

3-15  
cont.

#### **Law Enforcement**

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

3-16

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

#### **E. Drainage**

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

3-17

**F. Alternatives**

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

3-18

**G. Off Setting Development Impacts**

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

3-19

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

Sincerely,



David Mohlenbrok  
Community Development Director

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

<b>Letter 3</b>	City of Rocklin David Mohlenbrok, Community Development Director February 22, 2019
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- 3-1 The comment states that the EIR “discussion should also acknowledge that the project itself has the potential to introduce new residential development and other sensitive land uses in close proximity to WRSL due to the project’s proposal to reduce existing landfill buffer distances.” To clarify, as explained on Draft EIR page 4-3, “the baseline conditions for this Draft EIR are generally the conditions that existed in the SAP area in 2016,” consistent with State CEQA Guidelines Section 15125(a). The Draft EIR explains that “[t]his setting generally serves as the baseline against which environmental impacts are evaluated.” Therefore, the Draft EIR properly analyzes impacts associated with the landfill against existing conditions and existing sensitive receptors, not sensitive receptors that may exist in the future. Note, too, that the discussion of Impact 4.10-2 considers how future sensitive receptors would potentially result in impacts related to incompatibility of the WRSL with the proposed project. The issues raised by the commenter regarding the Draft EIR’s odor analysis in the Air Quality section are addressed by the Draft EIR’s discussion of land use compatibility in the Land Use section (Impact 4.10-2). Ultimately, the comment indicates that additional mitigation measures should be adopted and that the cost burden should not be left to taxpayers. See Master Response 4: Odors for a detailed discussion of the Draft EIR’s analysis of odor and land use impacts and for other details related to WRSL operations. Master Response 4 includes additional mitigation measures, including fair-share funding for odor reduction measures that would be implemented by WPWMA.
- 3-2 The comment suggests that Policy TM-1.9 incorporate payment towards or construction of off-site mitigations where impacts occur outside Placer County. Policy TM 1.9 has been modified to require that traffic impact studies be prepared for future development projects that are proposed after the 20-year level of development has been reached. See response to comment 4-13 for additional details and the specific revisions to the policy.
- 3-3 The comment expresses concern regarding the trip generation rate used for the EMU zone of the SAP. Fehr & Peers conducted a trip generation evaluation for the EMU area that compared the number of EMU trips included in the traffic modeling with the trip generation of regional retail, recreation, and conference center uses (i.e., the type of uses allowed in the EMU district). Based on this evaluation, the number of EMU daily trips reflected in the Draft EIR traffic analysis adequately covers the EMU area. The EMU trip generation in the Draft EIR is 2.7 times more than the number of daily trips generated by the Westfield Galleria at Roseville shopping mall and more than 10 times more than the Sacramento Convention Center. Furthermore, this evaluation showed that where relevant floor area data was available, the daily vehicle trip generation rate for these regional retail, recreation, and conference center uses was less than the 26 daily trips per KSF used in the Draft EIR traffic modeling.
- At this time, it is speculative to include a large capacity event venue in the traffic modeling as it is not specifically proposed as part of the project and is only one of many potential uses that could be considered in the EMU district. Also, the nature of “special events” is that they occur infrequently and should be handled accordingly. The County will require a more detailed traffic analysis if a venue is proposed that is capable of hosting large special events that attract occasional large crowd volumes. Since the Draft EIR was released, the County added a new policy to the SAP that requires traffic management procedures for special events, including notification to adjacent jurisdictions and notification of temporary closures or alternative routes.
- 3-4 The comment expresses concern regarding the change in ADT on Whitney Ranch Parkway presented in Exhibit 4.14-11 on page 4.14-47 of the Draft EIR. See response to comment 1-1 regarding the project’s anticipated redistribution of existing trips. This redistribution is anticipated to shift some trips from Wildcat Boulevard to Industrial Avenue, as shown in Exhibit 4.14-11. There is also a very

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



CITY MANAGER  
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Letter  
4

Shirlee Herrington  
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February 22, 2019

**Re: Comments on the Sunset Area Plan and Placer Ranch Specific Plan (SAP/PRSP) DEIR**

Dear Ms. Herrington,

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for a program-level analysis of the Sunset Area Plan (SAP) Update and a project-level analysis of the Placer Ranch Specific Plan (PRSP). This cover letter summarizes the City's areas of concern. More detailed comments are included as Attachment 1 to this letter.

The City would like to reemphasize its specific support of a university project in South Placer County and of the PRSP development concept in general. Throughout the process of developing the specific plans, commenting on the Notice of Preparation, and providing feedback on the Administrative Draft DEIR, the City has repeated its commitment to working in cooperation with Placer County on this important project. However, the City had previously requested that the description of the impacts to the City—and the mitigation measures to reduce or avoid those impacts—be fully disclosed and discussed in advance of DEIR publication, so that the measures identified in the DEIR are fully enforceable and agreed to by the City. Unfortunately, the City's concerns have not been adequately addressed. As such, it is the City's obligation to strongly express its concerns in this DEIR comment letter, as there will be significant environmental effects caused by the project in Roseville which remain unmitigated despite the availability of feasible mitigation measures.

4-1

The City has found the analysis and mitigation contained in the DEIR to be inadequate. The DEIR should be revised and recirculated to address the concerns outlined in this letter, and should also be recirculated with the fiscal analysis and proposed development agreements for the project, which should include the requirement to implement applicable mitigation measures identified in the DEIR. The City respectfully requests the opportunity to develop mutually-agreeable, adequate mitigation and the opportunity to review and provide input on the fiscal analysis and development agreements, prior to the recirculation of the DEIR.

The County published a staff report which listed areas of controversy and held a public hearing on the DEIR on February 14, 2019, at which a City representative provided oral comments. Of the twenty areas of known controversy, the City is particularly concerned with twelve, as follows:

- **Odor-related impacts:** The project includes an amendment to the Placer County General Plan's Solid Waste Public Facilities Buffer Standards to reduce the residential buffer zone of the landfill from one mile to 2,000 feet (or 1,000 feet on a case-by-case basis). Placer County General Plan Policy 4.G.11 further states: "When considering land use changes in the vicinity of a landfill operation, the County shall consider the landfill as the dominant land use in the area." The DEIR analysis acknowledges that reducing the landfill buffer could cause odor impacts and lead to incompatible land uses, which would create a need for solutions which are extremely costly or even infeasible, but concludes that because Placer County does not control the landfill, mitigation is infeasible. This conclusion is incorrect.

4-2



Payment of fair share fees is a feasible mitigation measure which would allow the landfill to make needed modifications, and should have been examined in the DEIR.

In addition, the project analysis of landfill impacts is limited to an analysis based on the existing condition. However, landfill expansion is a reasonably foreseeable project, and conceptual layouts for the expansion have been available since 2016 (see the Western Placer Waste Management Authority website: <https://www.wpwma.com/>) but the DEIR analysis does not examine the impacts of the project compared to the expansion. The DEIR must include this cumulative analysis in order to comply with CEQA; please revise the DEIR to include this cumulative analysis.

4-2  
cont.

- **Transportation impacts:** The City's General Plan Circulation Element, page III-33, includes Level of Service Policy 1, which requires a Level of Service standard of "C" at a minimum of 70% of all signalized intersections and roadway segments. According to the DEIR, the project will cause PM peak hour operations in Roseville to drop from 84% to 68% of intersections operating at Level of Service C (LOS C) or better. As a result, the proposed project will have a significant traffic impact and it will cause the City's traffic network to be inconsistent the City's General Plan. Furthermore, the DEIR identifies more than 40 mitigation measures which are not within the City's Capital Improvement Plan (CIP); therefore, there is no substantial evidence that the County has committed to ensuring that the proposed mitigation measures are fully enforceable. This is a significant concern to the City and is not adequately addressed within the DEIR.

4-3

Furthermore, Mitigation Measure 4.14-3 and 4.14-4 describe a fair-share fee program to offset the impacts to City of Roseville facilities that is not well-defined. The City has been requesting that the County work cooperatively with the City to craft mutually agreeable transportation mitigation measures since issuance of the NOP. These measures could have been better defined for review by the public by the time of publication of the DEIR, but the County elected not to coordinate acceptable traffic mitigation measures. The City is very concerned that the language presented in the DEIR about negotiating in "good faith" within a "reasonable time" does not commit the County to specific, feasible actions to offset impacts to City facilities and is, therefore, not enforceable mitigation.

- **Foothills Boulevard:** The DEIR fails to disclose that the Foothills Boulevard extension is a required project improvement, both on- and off-site. This critical roadway needs to be identified as a project responsibility and evaluated at a project-level to ensure that the improvements are feasible. The DEIR must analyze the entire off-site portion of the proposed Foothills Boulevard, which is a reasonably foreseeable improvement. Failure to include the project-level analysis in the DEIR jeopardizes the ability to obtain the necessary funding and right-of-way dedications. The DEIR indicates that 50% of the PRSP could be developed before this connection is needed and that 75% of PRSP would need to be built before the necessary funding is available. The City takes strong exception to the assessment of need. As explained in more detail in Attachment 1 of this comment letter, the impacts to Fiddymont Road and Woodcreek Oaks Boulevard are substantially underestimated in the modeling and therefore the Foothills Boulevard extension may be essential to mitigating impacts to Roseville roadways. As a result, the DEIR analysis of when this required facility will be necessary is significantly misstated. This improvement will be needed significantly earlier than indicated in the DEIR. Additionally, the City takes issue with the fact that the DEIR does not speak directly to the timing and funding of the roadway connection and bridge construction costs.

4-4

- **Public services:** The analysis has deferred detailed consideration of impacts on police/emergency services, fire services, and library services. All of the public service analysis in the DEIR acknowledges that the project will increase demands on these public services, but it does not identify locations for new or expanded facilities or the environmental impacts of such facilities. The mitigation does not include triggers for the timing of construction or include any performance standards. The project as proposed is very likely to result in increased demands on City services and require facility

4-5

expansions within Roseville. Roseville residents recently passed a sales tax measure (Measure B) to preserve—and in some cases restore—public service levels within the City. As currently proposed, the project would create an unfunded increase in City service demands; Roseville residents should not have to pay for services and expanded facilities required to support the project. The DEIR analysis and mitigation should be revised to ensure the project will meet anticipated service demands, in order to avoid impacts to City services and facilities.

4-5  
cont.

- **Public recreation and parks:** The analysis in the DEIR has not demonstrated that all required parkland is being provided to support the entire project. The analysis provides parkland credit to private facilities which are not publicly-accessible, and does not include the residential units contained within the SAP in its calculations. It also does not provide sufficient recreation facilities to meet County standards. All of this will result in the increased use of City park facilities, which will contribute to substantial physical deterioration of City park sites and the need to make physical improvements, without adequate funding sources.

4-6

- **Utilities Distribution and Treatment Capacity:** The DEIR fails to consider cumulative impacts related to both the landfill and wastewater impacts. Regarding the landfill, the DEIR does not analyze the proportional increase in solid waste generated by the Project and by full build out of the SAP, and its effects on the life-span of the landfill. Regarding wastewater, the DEIR compares the projected project wastewater flows to the current Pleasant Grove Wastewater Treatment Plan flows, rather than to the build-out flow conditions. As a result, the complete project impacts to the treatment plant are undisclosed in the DEIR.

4-7

- **Stormwater drainage facilities:** Implementation of the project would require construction of the planned Pleasant Grove Retention Facility in the City of Roseville, as stated on multiple pages within the DEIR (e.g. DEIR page 4.9-28). However, Mitigation Measure 4.9-1b is not sufficient, because it does not require payment of fair-share fees to the City, establish or discuss operational and maintenance funding, and does not reference the Pleasant Grove Retention Facility.

4-8

- **Conflicts with planned facilities:** As stated previously, the DEIR does not examine the project in light of the planned landfill expansion, and it also does not require right-of-way dedication for Placer Parkway.

4-9

- **Aesthetic impacts:** This is a significant new development area, which allows up to 150-foot-tall structures in the Innovation Center and up to 225-foot-tall structures in the Commercial Recreation, Hotel, and Hotel Resort land uses. The City of Roseville shares three miles of common border with the project area, but despite this fact the analysis in the DEIR only includes a single vantage point in the City, which is taken from Fiddymont Road at one limited angle of view. No photosimulations are provided, which makes it difficult to understand the scope of the impacts. The DEIR includes images from only a handful of viewing locations, which are not representative of actual viewpoints observed by the most affected viewer groups; has provided photos which are of limited scope/direction and do not represent the actual view of a person standing at the viewpoint; and have been taken from locations which ensure there are intruding visual encroachments in the foreground that distorts the actual view which would be experienced.

4-10

- **Project phasing and timeline:** The City is deeply concerned about the timing of mitigation measures in relationship to the timing of project phasing and construction. Many of the mitigation measures do not include development triggers or other timing mechanisms to ensure that needed mitigation occurs before or at the time of project impacts.

4-11

- **Noise:** The DEIR includes mitigation related to the City's Roseville Power Plant 2, but this mitigation does not include specific performance criteria to ensure that adequate sound attenuation would be achieved.

4-12

In addition to the concerns identified regarding areas of known controversy, the City has serious concerns about the cumulative impacts analysis of the project. Page 4-1 of the DEIR states that two levels of analysis are provided: project-level for the PRSP, and program-level for the SAP and University. Under the guise of providing a "program-level" analysis, this DEIR defers required analysis of known project details to a later date. While citing California Environmental Quality Act (CEQA) Guidelines Section 15168(a) to support this approach, the DEIR neglects to account for Section 15168(b), which states that the program EIR can "provide an occasion for a **more exhaustive consideration of effects and alternatives** than would be practical in an EIR on an individual action," and "**ensure consideration of cumulative impacts** that might be slighted in a case-by-case analysis." [emphasis added] The Program EIR option does not exist as a means of avoiding detailed analysis, as this EIR seems to imply; it exists as a means to streamline later analysis of subsequent actions by providing a comprehensive and connected analysis.

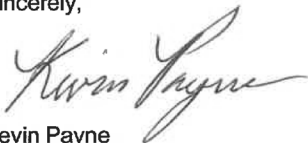
4-13

As an example, although modifications of the SAP land uses are proposed as part of this project, and the traffic generation of those uses can be determined at this time, the cumulative traffic study does not include intersection analysis of full project buildout. This avoidance of a complete analysis of the proposed land use is not consistent with the intent or purpose of a program-level analysis, and is an improper deferral. The County is proposing to adopt a land use plan without analyzing the impacts of the whole of the project. Either these complete project and cumulative impacts must be examined, or the portions of the project which are "well beyond the planning horizon" (DEIR page 4-1) should be excluded from the project.

As previously stated, the City supports the concept of development within the Placer Ranch Specific Plan area, and in fact—as the County is aware—was once the lead agency for development in this area. Acting as Lead Agency, the City prepared a draft Specific Plan and published a Notice of Preparation (NOP), to which the County responded. The City's expressed concerns about the current DEIR analysis are consistent with those which were once strongly expressed in the County's letter (dated January 26, 2015; Attachment 2) on the City's NOP.

Based on these known areas of controversy, it is clear that the significant environmental effects of the project have not been adequately addressed in the DEIR. The cumulative analysis is insufficient, and the specific comments included in Attachment 1 of this letter, require that the County revise and recirculate the DEIR to address the City's concerns. Recognizing the regional benefit of the project, the City offers its full participation in the development of mutually-agreeable, adequate mitigation measures. These measures need to be supported by a fiscal analysis and development agreements preserving Roseville's current and projected public service levels, which would significantly reduce the project's impacts to the residents of Roseville and South Placer County. It is for these reasons that the City requests revision and recirculation of the DEIR. If you have any questions regarding the City's comments on the DEIR, please contact Senior Planner Lauren Hocker at (916) 774-5272 or via email at [lhocker @pseville.ca.us](mailto:lhocker@roseville.ca.us).

Sincerely,



Kevin Payne  
Assistant City Manager

City of Roseville DEIR Comments for SAP/PRSP – February 22, 2019  
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Attachments:

Attachment 1 – Detailed City Comments on DEIR  
Attachment 2 – Placer County Comments on the City's NOP  
Attachment 3 – Pages from *City of Roseville Open Space Preserve Overarching Management Plan*  
Attachment 4 – Riley Library Borrower Map

Cc:

Dominick Casey, City Manager, City of Roseville  
Mike Isom, Development Services Director, City of Roseville  
Greg Bitter, Planning Manager, City of Roseville  
Lauren Hocker, Senior Planner, City of Roseville  
Michelle Sheidenberger, Assistant City Attorney, City of Roseville  
Ellen Garber, Esq., JD, Shute, Mihaly & Weinberger  
Todd Leopold, County Executive Officer, Placer County  
Steve Pedretti, Community Development Resource Agency Director, Placer County  
Michele Kingsbury, Principal Management Analyst, Placer County  
Crystal Jacobson, Principal Planner, Placer County

# ATTACHMENT 1

The City of Roseville has the following comments on the DEIR, which consist of general comments, followed by more specific comments on chapters and sections of the DEIR, as indicated below.

## General Comments

1. On Page 4-1, the DEIR states that it provides two levels of analysis: project-level for the PRSP, and program-level for the SAP and University. For the “program-level” analysis, this DEIR defers required analysis of known project details to a later date. While citing CEQA Guidelines Section 15168(a) to support this approach, the DEIR neglects to account for Section 15168(b), which states that the program EIR can “provide an occasion for a **more exhaustive consideration of effects and alternatives** than would be practical in an EIR on an individual action,” and “**ensure consideration of cumulative impacts** that might be slighted in a case-by-case analysis.” [emphasis added] The purpose of a Program EIR is not to avoid detailed analysis, as this DEIR seems to imply. Rather, the purpose is to allow streamlining later analysis of subsequent actions by providing a comprehensive and connected analysis. However, this analysis has done the opposite.

4-14

As an example, although modifications of the SAP land uses are proposed as part of this project, and the traffic generation of those uses can be determined, the cumulative traffic study does not include intersection analysis of the complete project buildout. This avoidance of a complete analysis of the proposed land use is not consistent with the intent or purpose of a program-level analysis, and is an improper deferral. The County is proposing to adopt a land use plan without having analyzed the impacts of the entire project. Either these complete impacts must be examined, or the portions of the project which are “well beyond the planning horizon” should be excluded from the project.

2. As a general rule of practice, legally adequate mitigation measures must:
  - Be quantifiable or sufficiently specific to demonstrate how the impact will be reduced;
  - Be fully enforceable through conditions or other binding agreements; and
  - Not defer formulation of measures until some future time, but may specify performance standards.

4-15

In addition, the impacts of the mitigation measures themselves should be analyzed.

Throughout the document, impacts to the City of Roseville are identified, but the mitigation measures simply state that the City of Roseville would be responsible for mitigation and the County will “coordinate with the City.” As discussed below, specific mitigation measures for impacts to Roseville must be addressed and analyzed in the DEIR and not deferred.

## Chapters 1- 3 (Introduction, Summary, Project Description)

3. Page 2-3, Required Permits and Approvals. Please add to the list an agreement with the City of Roseville delineating fair-share obligations for impacts to roadways within Roseville
4. Page 2-64, Impact 4.9-1, Mitigation Measure 4.9-1b. Development in Placer Ranch needs to fund additional design costs for any additional retention or detention storage needed to accommodate project stormwater runoff, as well as share in any associated costs including purchase, design, and

4-16

4-17

- technical studies (including environmental review) for such storage. In addition, funding for future maintenance and operations is required. A City/County funding agreement is required prior to any development approvals being granted that would rely on this facility for mitigating stormwater impacts. 4-17 cont.
5. Page 2-73, Mitigation Measure 4.11-5a. Is rubberized concrete intended to refer to rubberized asphalt concrete (RAC)? In order to provide permanent sound reduction, a surface paved with RAC must be properly maintained (regardless of material, road noise increases as a road wears) and must be resurfaced with RAC, which is not a traditional paving material. The mitigation measure does not establish a process or program to ensure that regular maintenance and resurfacing with RAC occurs. Also, RAC should not be used on designated Truck Routes, because research has shown that it is much less effective at reducing noise from heavy vehicles (Report on the Status of Rubberized Asphalt Traffic Noise Reduction in Sacramento County, Bollard and Brennan, Inc, November 1999). 4-18
6. Page 2-79, Mitigation Measure 4.13-8. How will the increased maintenance cost to the City be mitigated? It is anticipated that additional maintenance will be incurred due to the large increase in traffic from Placer Ranch. 4-19
7. Page 2-80, Mitigation Measure 4.14-1a. The widening of Sunset Boulevard needs to occur before the first building occupancy. 4-20
8. Page 2-80, Mitigation Measure 4.14-1b. The extension and widening of Foothills Boulevard from the City of Roseville to the project boundary needs to occur concurrent with the initial specific plan infrastructure construction. This is important to ensure that traffic impacts on City roadways are minimized to the extent practicable. 4-21
9. Page 2-82, Mitigation Measure 4.14-3. The impact fees associated with mitigation for impacts within the City of Roseville should include the cost of timing new signals and retiming existing signals to accommodate the increase in traffic. 4-22
10. Page 2-91, Mitigation Measure 4.14-10. Fair share contributions to regional roadways should include Placer Parkway. 4-23
11. Page 3-4, Exhibit 3-3 *Project Area Map*. Please note that the Local Agency Formation Commission (LAFCO) approved the Amoroso Ranch Specific Plan for annexation into the City of Roseville in December 2018. Please update the City of Roseville boundaries accordingly. 4-24
12. Page 3-7. The Project Objectives for the PRSP indicate that an objective is to integrate plans for Placer Parkway, including establishing a corridor, and that the impacts of the facility were covered in a previously approved EIR. It should be noted that the previous program level EIR/EIS and project approval only established where the corridor would be located, but it did not include specifics such as information on facility performance standards, right-of-way needs, dedication of land, cross-sections, buffers, or interchange designs. While some of this information is contained within the PRSP and SAP, this information should at least be referenced within the DEIR. Otherwise, it appears that the project has not been designed to accommodate the facility, and it is unclear whether the physical impacts of facility construction have been analyzed. The Specific Plan also does not include a requirement that developers dedicate right-of-way, despite this language being included for other facilities. Please see the City of Roseville's Amoroso Ranch Specific Plan and EIR (SCH# 2013102057) for an example of the level of detail which should be included in the analysis. 4-25

13. Page 3-16. Housing in the Commercial and Industrial zones. The project includes a General Plan Amendment, which will allow up to 30 residential units per acre within the Entertainment Mixed-Use, Innovation Center, and Light Industrial land uses. However, while up to 30 units per acre would be permitted, Table 3-3 of Project 20-Year Development does not list any housing units within these land uses. Because residential development of 30 units per acre would be consistent with the proposed General Plan Amendment, the table should be amended to disclose the assumptions used in the DEIR analysis, particularly the traffic study, for the amount of residential development that could be built within these commercial areas as part of the project description. 4-26
14. Page 3-23, Exhibit 3-7, Circulation Diagram. The sections of Foothills Boulevard and Industrial Avenue within the City of Roseville should be widened to match the required lane geometry required just to the north of the City. This should be figured into the project cost and/or accounted for in the mitigation fee. 4-27
15. Page 3-26, Public Transit. Please provide more details regarding the Bus Rapid Transit requirements, including additional travel lanes, queue jump lanes, and transit stations. The need for additional right-of-way dedication should be defined. 4-28
16. On page 3-55 in the discussion of recycled water, the 1<sup>st</sup> Paragraph, 2<sup>nd</sup> Sentence states: "...Recycled water would be provided to the PRSP area using existing infrastructure from the City of Roseville Dry Creek and Pleasant Grove Wastewater Treatment Plants...". The City will need to determine (based on capacity) which plant or plants will deliver the recycled water. Therefore, it is premature to determine whether the Dry Creek and Pleasant Grove waste water treatment plant would be selected. 4-29
17. On page 3-55 Wastewater Treatment, Paragraph 1, the final sentence states that the PRSP will generate average dry weather flows of 1.99 MGD. Under the utilities section of the DEIR and in the master sewer plan, it is determined that the Project will generate 2.17 MGD. Please modify the sentence on page 3-55 to refer to 2.17 MGD. 4-30
18. Page 3-58, PRSP Drainage System. The fees collected by the County for the Pleasant Grove Retention Basin should consider all previous and future costs for property acquisition, environmental, design, construction, operation, and maintenance. Refer to prior comment 4. 4-31
19. Page 3-64 Foothills Boulevard (north). This section does not mention the facility improvements which would be needed within the City of Roseville to complete the extension of Foothills Boulevard. While Page 4-5 incorporates by reference the City's Foothills Business Park Annexation EIR for the extension of Foothills Boulevard, the scope of the extension project has changed in terms of both the number of lanes and the proposed alignment, so the analysis cannot entirely rely on this prior EIR and the DEIR analysis must be supplemented. 4-32
20. Page 3-69, Pleasant Grove Retention Facility, last paragraph. The fee program referenced in this section must ensure that a mechanism is in place to fund all associated costs for property acquisition, environmental review, design, construction, operation, and maintenance. 4-33
21. Page 3-79, Section 3.8. Foothills Boulevard is described as a four-lane arterial in this section. In other places in the DEIR, it is described as a six-lane facility. Please revise the DEIR to be consistent. This section should also include offsite mitigation improvements or appropriate fees for the widening of Blue Oaks Boulevard between Washington Boulevard and Foothills Boulevard, and the extension of a four lane Roseville Parkway between Washington Boulevard and Foothills Boulevard. 4-34

**4.1 Aesthetics**

22. The update to the Sunset Area Plan will substantially increase development potential over the existing Sunset Industrial Plan. This update would allow buildings up to 150 feet in height in the Innovation Center and 225 feet in height in the Commercial Recreation, Hotel, and Hotel Resort land uses. The City of Roseville shares three miles of common border with this development area, but despite this fact, the visual analysis in the DEIR only includes a single vantage point in Roseville, which is taken from Fiddymment Road at one limited angle of view. No photosimulations are provided, which makes it difficult to understand the scope of the impacts. The quality of a view, and the impact thereon, depends on the viewing location and the viewer group observing the view. However, the DEIR has included only a handful of viewing locations, which are not representative of actual viewpoints observed by the public in those locations; has provided photos which are of limited scope/direction and do not represent the actual view of people standing at the viewpoint; and have been taken from locations which ensure that there are intruding visual encroachments in the foreground, thereby distorting the actual view that would be experienced. These comments will focus on the viewpoint in the City of Roseville, to explain the concerns.

4-35

For example, Viewpoint 6 is taken from the end of Fiddymment Road, and is intended to represent the existing viewshed for City of Roseville residents. Rather than taking the photo from the end of the road or sidewalk, the photo has been taken from a position farther back, which ensures there are barricades, a light standard, and other encroachments within the foreground. The analysis states that the vividness, unity, and intactness of the view are low, though it provides very little explanation of this conclusion. The City would agree that the vividness of the view is low, but the conclusions regarding unity and intactness are based entirely on the assumption that the viewshed includes a foreground consisting of incompatible urban residential elements. Many citizens of the City of Roseville who live and travel on the southern boundary of the Project site have significant views of the Sierra Nevada mountain range. Future development will likely block these views. Therefore, the City disagrees that aesthetic impacts would be less than significant, for the reasons stated above.

**4.3 Air Quality**

23. Page 4.3-9, Exhibit 4.3-1 shows that even at a distance of one mile, there are already many odor complaints due to the landfill. Therefore, the DEIR needs to more fully discuss the impacts of reducing the land use buffer surrounding the landfill, which will exacerbate odor impacts.

4-36

24. Page 4.3-11 Future WRWMA Operations. This section discusses the future program, but doesn't carry the analysis through the document. The landfill expansion plans are a reasonably foreseeable project and, due to the County's proposal to amend its General Plan to reduce the land use buffer between future residential development and the landfill, would increase odor impacts and land use incompatibility related to odor (see comments on Section 4.10, below). The DEIR should analyze and disclose these reasonably foreseeable significant impacts.

4-37

25. Page 4.3-51 concludes that because odor impacts are subjective, mitigation is infeasible, but this is not accurate. Please refer to the City's comments on the land use compatibility analysis; the project should include payment of fair share fees, which is feasible mitigation.

4-38

**4.4 Biological Resources**

26. The DEIR does not mention potential impacts to City of Roseville wetland preserve areas adjacent to the project, and should be corrected to reflect the following:

4-39



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- |  |  |               |
|--|--|---------------|
| <ul style="list-style-type: none"> <li>a. Show the adjacent City preserve areas graphically, specifically labeling the location of preserved wetlands.</li> <li>b. The open space preserves are owned by the City, and the City could be liable to federal and State permitting agencies if any impacts occurred to protected wetlands on its property. Therefore, the County's mitigation measure should include a requirement to submit improvement plans to the City's Open Space Manager for review and comment prior to construction.</li> <li>c. Onsite conservation plans should include a management approach for the locations where PRSP Area open space is contiguous with City of Roseville preserve areas. The City of Roseville recommends management consistent with the <i>City of Roseville Open Space Preserve Overarching Management Plan</i>.</li> <li>d. The Project's Design Standards currently show that open fencing will be provided adjacent to the City's open space preserve. Development adjacent to the City of Roseville preserve areas should use masonry walls, or fencing otherwise designed to prevent impacts to the biological resources (e.g., unauthorized drainage, gates for accessing the open space for recreational use, dumping of yard waste, landscaping, etc.)</li> <li>e. Project design must ensure that outfalls do not drain into City of Roseville preserve areas; therefore, the County's mitigation measure should specify this design requirement.</li> </ul> | <div style="border-left: 1px solid black; height: 100px; margin-left: 5px;"></div> | 4-39<br>cont. |
| <p>27. The potential for disturbance of biological resources in the adjacent City of Roseville preserve areas is high, and could be mitigated with measures including (but not necessarily limited to) the measures identified in Section 5.2 of the <i>City of Roseville Open Space Preserve Overarching Management Plan</i> (dated August 5, 2011), as included in Attachment 3, substituting the County as the overseeing agency.</p>   | <div style="border-left: 1px solid black; height: 40px; margin-left: 5px;"></div>  | 4-40          |

#### **4.9 Hydrology and Water Quality**

- |  |   |      |
|--|---|------|
| <p>28. The Hydrology and Water Quality chapter uses the term "future development" when describing all planned development in the SAP and PRSP. The City finds this terminology to be acceptable as long as the County agrees that the term "future development" is equivalent to "all SAP and PRSP development," all of which is reasonably foreseeable, such that no exclusions would occur.</p>  | <div style="border-left: 1px solid black; height: 40px; margin-left: 5px;"></div> | 4-41 |
| <p>29. Flooding of existing County properties, including the Gleason's and Amoruso Estates, are known areas of controversy, even during the two-year event. The DEIR does not address this issue. The DEIR should indicate whether the Project will create any increase in offsite flows that would impact these areas. This is of concern to the City, because flows from PRSP and SAP will be conveyed through the Amoruso and Creekview Specific Plan areas. Until the Amoruso and Creekview improvements are implemented, there may be additional impacts that are not currently identified in the DEIR. This should be addressed in the DEIR.</p>   | <div style="border-left: 1px solid black; height: 40px; margin-left: 5px;"></div> | 4-42 |
| <p>30. Page 4.9-28 indicates that implementation of the PRSP would require construction of the planned Pleasant Grove Retention Facility in the City of Roseville. However, Mitigation Measure 4.9-1b is not sufficient. The DEIR states that the City has already designed and approved, but has not yet constructed, the facility. It should be noted that the flows from this Project were not contemplated at the time the program-level City of Roseville Retention Basin Project (aka Pleasant Grove Retention Facility) EIR was certified (State Clearinghouse Number 2002072084). Additional environmental review will be required to construct the facility, particularly since DEIR Appendix C (Storm Drainage Report) indicates that the project will require expansion of this planned facility.</p> | <div style="border-left: 1px solid black; height: 40px; margin-left: 5px;"></div> | 4-43 |

Mitigation Measure 4.9-1b discusses payment of fair-share fees to the County, but not to the City, and does not specifically reference the Pleasant Grove Retention Facility. Mitigation Measure 4.9-1b also does not acknowledge the fact that the project will result in a need for expansion of the planned facility, which should be reflected in the fair-share fee developed for the project. Please add the following language to make it clear that a fair-share development fee will be required and is a fully enforceable mitigation measure:

*"The applicants for individual projects shall annex into the City of Roseville Regional Retention Basin fee district and pay the Pleasant Grove Drainage fee, which will be calculated to address the cost to accommodate the contribution of the Placer Ranch/Sunset Area project, to the City prior to the approval of each building permit. The fee shall be calculated to cover the fair share cost of retention and maintenance for that development's portion of the Pleasant Grove Retention Basin Project at the Al Johnson Wildlife Area."*

4-44

*Development proposals in the PRSP and SAP shall demonstrate, through the preparation of technical engineering studies, that the increased volume of stormwater runoff from the proposed development can be accommodated in the approved City of Roseville Regional Stormwater Retention Facility. The results of the study shall be submitted to the City of Roseville Public Works department for review and concurrence. If expansion of the retention basin is required, the County shall work with the City to expand the retention facility as necessary, following appropriate environmental review, and funded through fair share contributions by SAP project developers at the building permit stage."*

31. Page 4.9-28. Lakeview Farms Retention Basin. The City suggests updating the statement "currently planned for construction in 2018," date unless construction did start in 2018.

4-45

32. Page 4.9-31, Mitigation Measure 4.9-1a: Submit final drainage report (Net SAP Area and PRSP Areas) City recommends adding this statement at end of the paragraph "The final drainage report shall...address comments submitted during the public review period."

4-46

33. Page 4.9-43. The City is concerned that the DEIR does not define and map the 100-year floodplain areas for the entire project area, instead deferring that information and analysis of impacts within the 100-year flood zone (Impact 4.9-5) to future, individual projects as part of improvement plan submittal. As a direct result of this deferral, the analysis concludes that the impact is potentially significant, because the ability to avoid floodplain impacts cannot be known with certainty (DEIR page 4.9-43: "However, at this stage of planning, the details of these measures have not been developed, and the County conservatively determines this impact to be potentially significant." The City of Roseville is downstream in the Pleasant Grove Watershed, so any impacts due to increased development in the 100-year flood zone within the project area have the potential to cause downstream impacts in the City. The DEIR should be revised to disclose the location of the existing 100-year floodplain within the project area as a necessary prerequisite to considering the impacts of full buildout of the project.

4-47

As a result of the above concerns, the City also has questions and recommended changes to the proposed Specific Plan policies, which may help reduce or avoid this impact. Greater explanation should be provided for Policy PFS-5.6, which is unclear on the methodology that must be used to mitigate impacts (the policy states "unless another methodology has been agreed upon by Placer County.") Policy NR-3.2 also should be revised to add a definition for "calculated 100-year-floodplain," which should include a 100-year future, fully-developed floodplain.

34. Appendix D – Volumetric Retention Studies: ensure that the updated work that the County, City of Roseville, and consultants have produced up until October 2018 is incorporated into Appendix D and the DEIR.

4-48

**4.10 Land Use**

35. Page 4.10-14, Impact 4.10-2 discusses impacts related to consistency and compatibility with the Western Regional Sanitary Landfill (landfill), and concludes the impacts are potentially significant. The project includes an amendment to Placer County General Plan's Solid Waste Public Facilities Buffer Standards to reduce the residential buffer zone of the landfill from one mile to 2,000 feet (or 1,000 feet on a case-by-case basis). Existing Placer County General Plan Policy 4.G.11 further states: "When considering land use changes in the vicinity of a landfill operation, the County shall consider the landfill as the dominant land use in the area." The DEIR analysis acknowledges that the purpose of the existing buffer is to protect the landfill from pressures to implement odor control or reduction measures due to land use incompatibility. The analysis also acknowledges that a one-mile buffer is recommended by the Placer County Air Pollution Control District, though it does not mention that the same recommendation is contained within the California Air Resources Board "Air Quality and Land Use Handbook." Despite acknowledging these factors, and concluding on DEIR page 4.10-17 that the project would increase odor complaints and lead to pressure on the facility to implement additional odor control measures, the analysis concludes that because Placer County does not control the landfill, mitigation is infeasible. This conclusion is incorrect. Payment of fair share fees is a feasible mitigation measure which would allow the landfill to make needed modifications, and should have been examined in the DEIR.

4-49

In addition, the project analysis of landfill impacts is artificially limited to an analysis based on the existing condition. However, planning for landfill expansion is underway. Conceptual layouts for the facility expansion have been available since 2016, stakeholder outreach and planning have been ongoing since that time, and the Notice of Preparation for the expansion project is in development and expected to be released shortly (per the Western Placer Waste Management Authority February 14, 2019 Board of Directors agenda). The expansion is a reasonably foreseeable project, and conceptual layouts for the expansion have long been available, but the DEIR analysis does not examine the impacts of the project due to the expansion. Please revise the DEIR to include this cumulative analysis.

**4.11 Noise**

36. Page 4.11-34 Roseville Power Plant 2 – This section states that "The draft PRSP indicates a masonry wall would be located around the existing RPP2 site but does not provide specific performance criteria to ensure that adequate sound attenuation would be achieved." The DEIR should be modified to reflect the following:

- a. The specific plan developers shall be responsible for the construction of the wall, at their cost.
- b. The wall must meet City of Roseville Design and Construction Standards for sound barrier design, and should be submitted to the City for review, to ensure the City's facility is adequately protected from land use conflicts created by the Project.
- c. Mitigation Measure 4.11-4B should be revised to specify that either the wall, or a combination of a wall and setbacks, must result in the achievement of Placer County noise standards. Currently, the measure says only that a 5 dB reduction in sound is required, which is insufficient to offset this impact.

4-50

**4.13 Public Services**

37. Page 4.13-24, Impact 4.13-1. The City of Roseville Fire Department is currently providing a disproportionate level of service due to calls for service in Placer County in order to backfill

4-51

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services in the Sunset Area. This project has the potential to substantially increase the need to provide mutual aid. This is not currently addressed in the DEIR. Although Mitigation Measure 4.13-1b states that two fire stations must be constructed in order to offset impacts of the project, the measure does not identify the locations, provide triggers for the timing of construction, or include any performance standards for determining the effectiveness of this mitigation measure, instead deferring that to a future decision-making process. The City has previously made this comment, and in response the DEIR has included a statement that fire stations are a permitted use on commercially zoned properties; this is not sufficient. Rather, the DEIR must disclose the size of the stations, where they will be located, the timing for construction, and how they will be funded, which are essential to the understanding of the impacts to the City of Roseville Fire services and whether they are being mitigated.

4-51  
cont.

38. Page 4.13-27, Impact 4.13-2. The DEIR does not adequately address the law enforcement impacts and increased demands which would affect the Roseville Police Department. The plan area would directly adjoin the City of Roseville and would create the physical and visual impression that it receives law enforcement services from the City of Roseville. DEIR Page 4.13-1 specifically identifies that the City of Roseville expressed concern about impacts to City law enforcement services, but does not discuss City police services. The City has the following concerns:

- a. Communications Center impacts. Citizens seeking law enforcement services increasingly rely on cellular phones for their primary telephone services and do not have landline phones. Cellular 9-1-1 calls under the current technology are routed to the nearest "public safety answering point" (PSAP) via an imprecise system based on cellular phone tower location and antenna orientation. This project will result in daily increased calls for service to the Roseville Police Department, which is the PSAP for Roseville and handles all 9-1-1 calls, police dispatching, fire dispatching, and EMS dispatching for the City of Roseville. This increased demand would adversely affect the capabilities of the RPD because dispatcher workload would increase. Dispatchers would have to answer every additional call, triage the need for services, and then route to the proper agency, which is likely to result in reduced response times. The DEIR includes no discussion of this critical public safety impact.
- b. Traffic impacts. The California Highway Patrol Auburn Office provides coverage to hundreds of miles of state and county roadways and is lightly staffed. The Roseville Police Department is regularly tasked to respond and assist at major collision scenes near our city because of their staffing shortage. The proposed plan will greatly increase traffic volumes, on Fiddymont Road and Blue Oaks Boulevard, as indicated by the traffic impact study in the DEIR, which will result in increases in accident rates. This will result in increased demands upon the Roseville PD and Roseville FD to respond to collisions within the City. The DEIR states that because the project is not adding to the freeway system, no impacts to CHP services will occur, which is not accurate. Without additional CHP staffing the Roseville PD will receive increased requests for allied agency assistance from the CHP to this area.
- c. Page 4.13-27, on staffing for police services. Policy 4.H.1 of the County General Plan states: "within the County's overall budgetary constraints, the County shall strive to maintain the following staffing ratios (expressed as the ratio of officers to population): a. 1:1,000 for unincorporated areas." The DEIR does not adequately explain how the County will maintain this staffing ratio for the planned development, and whether additional stations or other physical facilities will be required. The DEIR indicates that 19 additional officers will be needed for the project. Nineteen officers will not meet the residential growth (24K population/roughly 8,000 units). An urban standard of one officer per thousand population would require a minimum of 24 Officers. There is also no analysis of the impacts due to a reasonably foreseeable student population of 30,000 at the proposed

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university, even though some proportion of this population will live off-campus within the project area or surrounding cities such as Roseville. Additionally, there is no discussion regarding timing of officers, how police response will be handled during initial phases, or mutual aide.

- d. Response Times. The proposal would result in law enforcement staffing which is below the standards set forth in the County's General Plan. On page 4.13-4 of the DEIR, it is stated that the average call response rate is 15 minutes for Priority 1 calls. According to Policy 4.H.2 of the County General Plan: "The County Sheriff shall strive to maintain the following average response times for emergency calls for service: 6 minutes in urban areas." The DEIR does not include an analysis of how this development will affect response times.

4-52  
cont.

39. Page 4.13-33, Impact 4.13-4. The project impacts to the City's Martha Riley Community Library (Riley Library) is a concern. The Riley Library is only 3.5 miles away from the project area. City of Roseville Parks, Recreation, and Libraries staff mapped the home addresses of all library cardholders who use the Riley Library (see Attachment 4), and found that a significant number of users are within close proximity to the County's Rocklin library and, nevertheless, still utilize Riley Library. This indicates that use of the Riley Library would increase even more due to the proximity of the project plan area to the Riley Library. This impact is acknowledged by the DEIR, but neither the SAP nor the PRSP include a public library to meet demands, and no fair-share fees to the City are included in mitigation. The DEIR instead speculates that it is possible the proposed university will provide a library which meets community-wide needs and is publicly accessible. The conclusion further states that unmet library demands within the project will be supported by a planned regional library within Placer Vineyards (DEIR page 4.13-34), even though the library is not currently planned for construction and would be a minimum of two miles farther away for residents than the City's Riley Library. With no commitment from the future university and no funding to build a new library within the project area, the City is concerned about the increased demand that will be placed upon the City's library, which could require expansion. This is an unmitigated and unfunded impact to the City library system which must be addressed in the DEIR.

4-53

40. Page 4.13-35, Impact 4.13-5. The City has a number of concerns related to the DEIR analysis of park impacts, as follows:

- a. The DEIR includes privately-owned park acreage in its determination that required parkland dedications are met. This is inappropriate, because this private parkland is not accessible to the public. At a minimum, the DEIR must demonstrate that the parkland dedication requirement will be met both for private and public subdivisions, to ensure that private parkland isn't being used to meet demand generated by populations who will not have access to these private recreational facilities. Counting private recreation facilities towards parkland requirements increases unmet park needs and increases the likelihood that residents of the project will increase use of and substantially degrade City facilities.
- b. While the SAP area includes fewer residential units than the PRSP area, it will nonetheless generate a population that will have a demand for parkland. The DEIR does not include these units in its calculations of parkland, which further increases the unmet needs that City facilities will fill and impacts on City park and recreational facilities. See prior comment, above.
- c. Thank you for looking at expanding one of the plan area's park sites. It certainly helps in addressing the recreation needs of the new community. According to the County standards, 4 hardball diamonds, 4 little league diamonds and 6.6 soccer fields are needed based on the projected population. Only 2.5 little league fields and 4.5 soccer fields are planned,

4-54

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however, leaving the unmet needs to be addressed by the City of Roseville. With no commitment from the future university to provide additional public park and recreation facilities, this impact on City park and recreation facilities due to increased use and facility wear and tear, leading to substantial deterioration of the facilities, will remain a significant unmitigated impact. See Comments 2 and 3, above.

4-54  
cont.

- d. The DEIR discloses Roseville parks that are likely to be impacted by the project, but excludes key facilities from the list. The DEIR should be revised to discuss Stizzo Park, Harrigan Greens, Bos Park, Sierra Crossing Park and Astill Family Park. In addition, page 4.13.38 references Maidu Regional Park, but the closest regional park is Mahany Park, which is not listed or shown in the DEIR.
41. Page 4.13-44, Impact 4.13-13: Cumulative impacts due to additional demands on existing park and recreation facilities within the City of Roseville are potentially significant. The City has implemented in-lieu fees as a mechanism to address city-wide or regional parks within our boundaries. This does not include or address impacts or increased demands from beyond city limits, however, as described in the comments above. Therefore, this is an unmitigated and unfunded impact to the City's park system which must be addressed in the DEIR.

4-55

#### **4.14 Transportation and Circulation**

42. The City previously requested that the County address the extension of Foothills Boulevard. The DEIR continues to lack a description and analysis of the Foothills Boulevard Extension even though it is a necessary improvement for buildout of the project. This critical roadway needs to be identified as a project responsibility and evaluated at a project level to ensure that the improvements are feasible. The DEIR must include an analysis of the entire off-site portion of the proposed Foothills Blvd. Failure to include a project-level analysis at this time jeopardizes the ability of the County to obtain of funding and right-of-way dedications. Page 4.14-51, Foothills Blvd Extension: The DEIR specifies that 50% of the PRSP could be developed before this connection is needed, and that 75% of PRSP would need to be built before the necessary funding is available. The City takes strong exception to this assessment of need. The City's concerns with project scenario modeling assumptions, also stated elsewhere in this comment letter, indicate that the impacts to Fiddymont Road and Woodcreek Oaks Boulevard are substantially underestimated, and therefore the Foothills Boulevard extension may be essential to mitigating impacts to Roseville roadways. As a result, the DEIR analysis of the when this required facility will be necessary is significantly misstated as well. Additionally, the City takes issue with the fact that the DEIR does disclose the timing and funding of the roadway connection and bridge construction costs.

4-56

43. The analysis of the cumulative scenarios assume the completion of major roadways outside the boundaries of the project. The construction of these regional improvements will provide alternative routes of travel that will effectively minimize impacts to the City. Many of these projects rely on funding programs that have yet to collect the needed money to compete the projects. Therefore, to insulate the City from development impacts, without the assumed project in place, a Phasing plan should be developed that identifies threshold of absorption that could occur prior to the completion of corresponding improvements of certain roads that aid in minimizing impacts to existing streets.

4-57

44. The traffic modeling assumptions used in the scenarios analyzed in the DEIR include roadways connecting Fiddymont Road to Blue Oaks Boulevard, and Woodcreek Oaks Boulevard to Blue Oaks Boulevard through residential neighborhoods via Crocker Ranch Road and Parkside Way. While Crocker Ranch Road is a residential collector, this roadway has not been included in any previous traffic impact model analysis. Parkside way is a local residential roadway with residential frontages and is not appropriate to include in the model as a major linkage. A traffic impact analysis should

4-58

not rely on or include minor residential roadways such as these, because it creates alternate cut-through routes that are inappropriate, and artificially lowers modeled volumes on major arterials. Inclusion of these minor residential roadways in the model leads to an under-representation of the impacts on Fiddymment Road and Woodcreek Oaks Boulevard, as well as the impacts and timing expectations for the Foothills Boulevard extension as a required offsite improvement of the Project. The “Existing plus Project” model indicates 20,000 ADT on Parkside Way, a local residential roadway, and up to 24.9K ADT on Crocker Ranch, a two lane residential collector. These links should be removed from the model in order to accurately estimate the impacts to Fiddymment Rd Woodcreek Oaks Blvd and other roadways and intersections in the Study Area.

4-58  
cont.

45. Pages 4.14-94 through -96. The Cumulative “No Project” traffic modeling and the various “Cumulative Plus...” scenarios include assumptions that are not reasonably foreseeable. The City does not agree with the following assumptions:

- a. Full buildout of SR65/I-80 interchange improvements. **Comment:** While the SACOG MTP/SCS includes completion of this facility, funding sources are speculative and unsecured at this time. It is unlikely that full buildout of the interchange improvements will be funded and completed before significant traffic impacts develop as a result of the Project. Phase 1 and Phase 2 of the interchange project are reasonably foreseeable, based on funding sources. The model should be revised to reflect completion of Phase 1 and Phase 2 of the interchange only, in order to accurately calculate estimated impacts to other roadways and intersections in the study area.
- b. Completion of Placer Parkway to Santucci Blvd/Watt Ave. **Comment:** The City does not agree with the statement that construction of this segment is “predicated on development in the PRSP area.” Placer Parkway is an independent facility approved by the Placer County Transportation Planning Agency (PCTPA) in 2009 to meet regional transportation needs; it is not part of or solely dependent upon the SAP/PRSP project. The project and DEIR do not include a commitment by the County to build this facility with the project, nor does it include the necessary project-level environmental review required to build the facility. Completion of this segment of Placer Parkway is subject to funding provided through the SPRTA Tier II fee program which relies on development impact fees collected through full buildout of several other large development projects—projects which the transportation analysis does not include in the Project study area, such as buildout of Placer Vineyards and other areas subject to the SPRTA Tier II fee program identified in the Tier II Development Fee MOU dated December 9, 2008.

4-59

Completion of Phase I of Placer Parkway can be reasonably assumed at this time due to the ongoing collaborative efforts between Placer County and the United Auburn Indian Community, in coordination with PCTPA, to advance funding for Placer Parkway Phase I. However, the Phase 2 segment cannot be assumed without including full buildout of the fee areas included in the SPRTA Tier II MOU. Therefore, completion of Placer Parkway Phase 2 is not reasonably foreseeable and should be removed from the model in order to accurately determine project impacts on the other roadways and intersections in the study area. If Placer Parkway Phase 2 is to be included as a reasonably foreseeable improvement, then the traffic analysis must be modified to assume full buildout of the SPRTA Tier II fee program areas as identified in the SPRTA Tier II MOU.

The result of these issues is a DEIR that misrepresents and understates cumulative transportation impacts. Having determined that Placer Parkway is dependent upon the project, the DEIR includes a Cumulative No Project scenario which excludes Placer Parkway and a Cumulative Plus Project scenario which includes the facility. Placer Parkway is a regional facility that causes significant changes to traffic distribution, which skews the

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*analysis and significantly underreports the impacts of the project on Roseville's traffic network.*

- c. Riego Road is widened to four lanes from SR 99 to Placer County line. **Comment:** *These improvements are unfunded and are not currently identified in an established fee program. Further, these improvements are not included in the SACOG MTP/SCS. This segment improvement should be removed from the model in order to accurately determine project impacts on Riego/Baseline Road and other roadways and intersections in the study area.* 4-59 cont.
46. Blue Oaks Boulevard is extended west of Roseville city limits to Santucci Boulevard. **Comment:** *This segment is unfunded and not currently identified in an established fee program. This segment improvement should be removed from the model in order to accurately determine project impacts on Blue Oaks Blvd and other roadways and intersections in the study area.*
47. Page 4.14-39. The proposed LOS E within the project (Policy TM-1.2: Level of Service) is significantly lower than the adjacent County LOS C and City of Roseville LOS C. This will result in an inconsistency in the width and number of lanes on the two major roadways connecting PRSP to the Amoruso Ranch Specific Plan (ARSP). The ARSP model identified the need for 4-lane minor arterial roadways while the PRSP model indicates the need for 2-lane collectors. Increasing the PRSP roadways to 4 lanes would allow more south-westerly traffic volumes to utilize the 4-lane connections to 6-lane Westbrook Boulevard, which would alleviate project impacts to Fiddymont Road and Woodcreek Oaks Blvd. 4-60
48. Page 4.14-13, Table 4.14-8. Unsignalized intersection Operations – Existing Conditions. Junction/Park Regency will be signalized during summer 2019 by the City. Woodcreek Oaks/Crimson Ridge & Woodcreek Oaks/Painted Desert were signalized in 2018. Woodcreek Oaks/Northpark & Woodcreek Oaks/Parkside would need to be signalized at the time Woodcreek Oaks is “punched through” due to ongoing political and safety concerns. With all of these existing conditions changed, how does that change the model? The traffic analysis should be updated to reflect these factors, particularly with respect to the analysis of the proportion of intersections operating at LOS C or better. (These same comments apply to pages 4.14 69-71) 4-61
49. Page 4.14-27, Policy 3.A.7 – Dry Creek/West Placer Community Plan – Arterial roadway Baseline – Sutter County Line to Walerga Rd/Fiddymont Rd: LOS E & Intersections Baseline Rd/Watt: LOS F and Baseline Rd./Fiddymont: LOS F. Potential impacts to the above facilities, for the portions which are within the City of Roseville, should be analyzed in the DEIR based on City of Roseville level of service policy/standards. 4-62
50. Page 4.14-29. The DEIR includes the City of Roseville General Plan Policy establishing an LOS C threshold for all signalized intersections and roadway segments, but needs to be corrected as shown below in **bold, underlined** text. 4-63
- 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.
51. Page 4.14-29. The City's LOS policy applies to both roadway segments and intersections. Instead of expressing roadway segment LOS policy in terms of volumes, the City relies on its intersection LOS criteria to determine roadway width needs; that is, the number of through lanes needed for an intersection to operate at an acceptable LOS C is equivalent to the number of lanes needed on the 4-64



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- roadway segment leading up to the intersection. Despite this adopted policy for roadway segments, no roadway segment impacts have been analyzed or identified in the DEIR for the City of Roseville. | 4-64  
cont.
52. Page 4.14-35. Proposed Road Access. Woodcreek Oaks Boulevard southerly into the City of Roseville –DEIR Impact 4.14-4 states that signal warrants will be met for this facility until the Foothills Boulevard extension is completed, at which point volumes would reduce to levels below signal warrants. Given that the DEIR specifies 75% of PRSP would need to be built before the necessary funding for Foothills Boulevard is available, mitigation should specify that a signal must be installed at Woodcreek Oaks/Parkside and Woodcreek Oaks/Northpark at the project's and/or County's expense. In addition to meeting signal warrants, this improvement will be vital because these intersections serve a park and school, and the signals will be needed to avoid safety impacts. Currently the City has been able to mitigate these safety impacts with an all-way STOP and pedestrian improvements, but these measures will no longer be effective due to the planned increase in traffic due to the project. The analysis should be updated to disclose this impact and identify effective mitigation. | 4-65
53. Page 4.14-39. Proposed Sunset Area Plan Goals and Policy. Building off of policy TM-1.11: *Autonomous Vehicle Technology* there is no mention of any other Intelligent Transportation Technology/Systems (ITS) in this section or any other mention of it within the Transportation section. ITS technology needs to be incorporated into all areas of the transportation plan to take advantage of innovative technology that will help provide the safe and efficient movement of traffic within and between the jurisdictions. | 4-66
54. Page 4.14-42, Policy TM-5.1 – Truck Routes – The County needs to work with adjoining/local agencies when updating its commercial (STAA) routes to ensure that adequate routes are provided to and from the local freeway system. A mitigation measure or policy language should be added to the DEIR and Specific Plan to reflect this. | 4-67
55. Page 4.14-45, Exhibit 4.14-9. The change in ADT existing and existing plus Project Buildout shows only 40+ new trips generated on Fiddymont north of Pleasant Grove and Blue Oaks, which seems like an obvious underestimate of traffic on this four-lane roadway. Page 4.14-49 states that it would operate at LOS D, E, or F, which is extremely unclear. | 4-68
56. Page 4.14-50. Phase 1 of Placer Parkway – This section states that several roadways and intersections in Roseville will experience degraded traffic operations, and that the County is currently in the final design stage for Phase 1 of Placer Parkway and is trying to secure funding for those improvements. The DEIR states that if funding is secured, construction is anticipated to be completed by 2022, which will help mitigate the traffic impacts. The DEIR further states that approximately 25% of the PRSP could be developed prior to the opening of Phase 1 of Placer Parkway, and that these impacts are considered significant and unavoidable. Given that funding is unsecured and construction documents have not been started, the estimate of a 2022 completion date for Placer Parkway Phase I is unrealistic. Since this facility is being relied upon to offset impacts, mitigation should be included which includes a development trigger for the facility. That is, mitigation must specify the amount of dwelling units representative of 25% buildout, and require that the facility be installed before any further residential building permits are issued. | 4-69
57. Page 4.14-51. Significance after Mitigation – The DEIR explicitly states there is a timing gap between when significant impacts to Roseville facilities will occur and when funds for mitigation will become available. Specifically, it is stated that impacts will begin at approximately 50% of planned PRSP development, but funds for improvements wouldn't be available for any mitigation projects until 75% of the development in the PRSP area occurs. This is considered a significant and unavoidable impact when relying on the TIF program for mitigation, but the analysis does not | 4-70

- explore or describe whether there is other feasible mitigation which could reduce the impact at the time it occurs. 4-70 cont.
58. Page 4.14-54. SAP Area – PFE/Watt – will experience an increase in delay from 85 seconds to 492 seconds, which is more than 8 minutes. The DEIR states that the facility will meet signal warrants, but there is no discussion of whether the installation of a traffic signal in this location is within the Sacramento County CIP or planning documents. 4-71
59. Page 4.14-59, Impact 4.14-3: The City's General Plan Circulation Element, page III-33, includes Level of Service Policy 1, which requires an LOS standard of "C" at a minimum of 70% of all signalized intersections and roadway segments. According to the DEIR, the project will cause PM peak hour operations in Roseville to drop from 84% to 68% of intersections operating at Level of Service C (LOS C). As a result, the proposed project will have a significant traffic impact because it will cause the City's traffic network to be inconsistent with its own General Plan. Furthermore, the DEIR identifies more than 40 mitigation measures which are not within the City's Capital Improvement Plan (CIP); therefore, there is no substantial evidence that the County has committed to ensuring that the proposed mitigation measures are fully enforceable. This is a significant concern to the City and is not adequately addressed within the DEIR. More specific concerns, which add to this comment, include:
- a. The Traffic report identifies impacts on several facilities anticipated to operate at less than LOS C that otherwise would be classified as significant and unavoidable or mitigated to achieve a higher LOS, except that the SAP calls for changing the policy to LOS E (Policy TM-12). This is in contrast to the City/County MOU which expressly states that the County will achieve an LOS policy of C for all urban and suburban roadways excepting those that are within a ½ mile of state highways, where LOS D is acceptable.
  - b. There are multiple capacity improvements which the DEIR states are within the City's CIP, and on that basis the analysis concludes the impacts are not significant. However, the analysis does not discuss how the project affects the timing of these improvements. The City's CIP identifies when improvements are needed, and bases its funding on that timing. The proposed project will result in many of these improvements being needed much sooner—decades sooner—than had been anticipated, and yet this impact is not discussed. 4-72
  - c. 4.14-68 Signal Timing Improvements/Optimization is listed as a mitigation measure that is feasible and is part of the City of Roseville's regular maintenance by City staff. The listed timing changes are not necessarily part of the City's "routine maintenance," however. The City must carefully consider any timing modifications, because adding green time to one movement will necessarily delay other movements, causing further impacts. Therefore, all of these proposed timing modifications must be evaluated to demonstrate that they would mitigate the identified impact without causing other impacts. This analysis should be provided within the DEIR.
  - d. A significant number of mitigation measures identified to improve impacts to City facilities are insufficiently analyzed or are infeasible. Examples include the following:
    - i. Mitigation Measure - Modify Signal Timing: The signal modification is proposed at multiple locations as a mitigation measure. Timing changes could adversely affect existing signal coordination along major corridors. Additionally, there will be costs associated with retiming individual signals and retiming the corridors. Additional evaluations should be completed to accurately determine the financial and LOS impacts to the City of Roseville. The following corridors require a more thorough investigation:

1. Blue Oaks Blvd Corridor
  2. Cirby Way Corridor
  3. Douglas Blvd Corridor
  4. Pleasant Grove Blvd Corridor
  5. Roseville Parkway Corridor
- ii. Mitigation Measure – Add Right Turn Overlap/Prohibit U-turn Movement: This mitigation measure is proposed at multiple intersections. In most cases, this would cause impacts that would restrict access to local businesses, and would therefore be infeasible to implement. Furthermore, the structural improvements which would be needed to implement these measures have not been identified, so the costs are unknown and are not contained in any existing fee program. These costs could be significant due to the large quantity of intersections affected. The following intersections are examples of infeasible mitigation:
1. Cirby Way/Riverside Ave Intersection
  2. N Sunrise Ave/Lead Hill Blvd Intersection – Business owner opposes restricting u-turns. U-turns were previously restricted and restrictions were removed due to impacts to business owners.
  3. Pleasant Grove Blvd/Fiddymont Road Intersection
  4. Pleasant Grove Blvd/Washington Blvd Intersection
- iii. Mitigation Measure – Intersection Widening: This mitigation measure includes construction of additional through and/or turn lanes which would require roadway widening at multiple intersections. Further analysis needs to be completed to evaluate potentially significant improvement costs that currently are not identified in any fee program. These costs include, but are not limited to, ROW acquisition/eminent domain, widening of receiving lanes, existing utility relocations, signal modifications, approval from Caltrans and other jurisdictions, and environmental impacts related to the improvements. Some improvements may not be feasible at all due to proximity to existing structures or City Council action. Some examples include:
1. Cirby Way/Riverside Ave Intersection – Roseville City Council has previously determined via Resolution that a third left turn lane at this location is feasible or desirable.
  2. Sunrise Blvd/Douglas Blvd Intersection – Infeasible due to proximity to existing structure.
  3. Roseville Parkway/Taylor Road Intersection – The mitigation is to widen west-bound approach to include a fourth through lane, but the facility is constricted by bridges on both sides and is infeasible.
- iv. Improvements proposed at the following locations are unclear based on existing geometry:

4-72  
cont.

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| <ol style="list-style-type: none"> <li>1. Douglas Blvd/I-80 Offramp</li> <li>2. Pleasant Grove Blvd/SR-65 Northbound Ramp</li> <li>3. Pleasant Grove Blvd/SR-65 Southbound Ramps</li> <li>4. I-80 Westbound Offramp/Riverside Ave</li> <li>5. SR-65 Northbound Ramps/Stanford Ranch Road</li> </ol> | <div style="border-left: 1px solid black; height: 100px; margin-left: 10px;"></div> | 4-72<br>cont. |
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| <p>60. Page 4.14-63, Mitigation Measure 4.14-3 and 4.14-4 describe a fair-share fee program to offset the impacts to City of Roseville facilities. The measure states that the County “shall negotiate in good faith” with the City “with the intention of achieving, within a reasonable time period after approval [ . . . ] commitment for the provision of adequate fair share mitigation.” The project impacts to City facilities are extensive, and this mitigation measure is not well defined. The City has been requesting the County work cooperatively to craft mutually agreeable transportation mitigation measures since issuance of the NOP on November 3, 2016, so that these measures could be better defined for review by the public by the time of publication of the DEIR, but the County did not do so. The City is very concerned that the language presented in the DEIR about negotiating in “good faith” within a “reasonable time” does not commit the County to specific, feasible actions to offset impacts to City facilities and is, therefore, not enforceable mitigation.</p> <p>In addition to lacking a firm commitment, the measure contains extraneous information which complicates the ability to achieve a good faith negotiation. The measure provides that the County may, at its own discretion, choose to include other jurisdictions and the formation of a JPA in the negotiations; this measure is to offset <i>project impacts to City of Roseville facilities</i>. All mention of negotiations with other jurisdictions and “regional improvements” should be eliminated, as they are unrelated to the impacts the measure is seeking to offset. The measure should also eliminate the explicit requirement that the negotiated agreement contain reciprocity, because again, this measure is to address <i>project impacts to City facilities</i>. The City agrees that it may be time to consider a broader discussion of a regional transportation fee agreement which includes reciprocity, but that should be a separate negotiation; it is unrelated to this CEQA mitigation measure.</p> <p>Finally, the City is concerned that this measure states that fair-share fees are to be paid to Placer County, but does not include language which specifies that the funds are to be held in trust for the City of Roseville, or that the funds must be used to improve the specified facilities within the City.</p> | <div style="border-left: 1px solid black; height: 150px; margin-left: 10px;"></div> | 4-73 |
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| <p>61. The following Sunset Area Plan figures require amendment:</p> <ol style="list-style-type: none"> <li>a. Figure 1-2 Draft Land Use Diagram – update Foothills Blvd extension through Duluth</li> <li>b. Figure 2-1 Draft Circulation Diagram - update Foothills Blvd extension through Duluth. Is it a 6 lane with median?</li> <li>c. Figure 2-2 Bike and Pedestrian Mobility Plan - update Foothills Blvd extension through Duluth</li> <li>d. Figure 4.1.1 Circulation Diagram - update Foothills Blvd extension through Duluth</li> <li>e. Figure 4.1.2 Bike and Pedestrian Mobility Map - update Foothills Blvd extension through Duluth.</li> </ol> | <div style="border-left: 1px solid black; height: 150px; margin-left: 10px;"></div> | 4-74 |
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- f. Figure 4.7.1 Foothills Boulevard Location - update Foothills Blvd extension through Duluth – need to show cross section of Duluth
62. The following DEIR figures need to be amended:
- a. Exhibit 3-5 SAP Land Use Diagram – update to show Foothills Blvd extension through Duluth
  - b. 3.6.1 Roadway Improvements Outside the PRSP Area – The extension of Foothills Boulevard through Duluth is shown in Exhibit 3-24 as a project related improvement, however the text in this section does not identify or describe the improvement.
  - c. Exhibit 4.14-6 Placer Ranch Specific Plan Roadway Network- Foothills Boulevard extension is shown as a 4-lane roadway not the 6 lane as outlined and assumed in the DEIR
  - d. Exhibit 4.14-7 Sunset Area Plan Network - Foothills Boulevard extension is shown as a 4-lane roadway not the 6 lane as outlined and assumed in the DEIR
  - e. In addition, figures in the Traffic Impact Study are inconsistent throughout the document, showing portions of Foothills which will be four lanes in some cases and six lanes in others.
63. Page 4.14-91, Impact 4.14-13. As with other impacts to City services which have been raised throughout our comments, residents of the project area could be expected to rely on City of Roseville transit services. The DEIR provides no evaluation of transit trip distributions or of potential impacts to City of Roseville Transit. The DEIR should be revised to examine these potential impacts.

#### **4.15 Utilities**

64. The DEIR fails to analyze the impact on the landfill and the Materials Recovery Facility (MRF) due to the proportional increase in solid waste generated by the Project and by full build out of the SAP. The additional solid waste generated as a result of construction and operation of the project will reduce the life-span of the landfill. Expansion of the landfill will result in a financial burden to the rate payers, including Roseville residents. Mitigation should be required to ensure that the project pays its fair share for mitigation of the cumulative impacts to and expansion needs of the landfill. Furthermore, because the analysis did not examine full build-out of the SAP, the DEIR does not analyze the full extent of impacts to landfill capacity and solid waste disposal needs.
65. A wastewater metering facility location will be required for influent flows directed to the Pleasant Grove Wastewater Treatment plant, but the need for this facility has not been discussed in the DEIR, a location has not been disclosed, nor have the impacts been analyzed. The DEIR should be revised to include this information.
66. A recycled water metering facility location will be required, but this facility has not been discussed, nor has a location been disclosed in the DEIR and the impacts have not been analyzed. The City requests that this facility be located at the City/Placer Ranch boundary. The DEIR should be revised to include this information.
67. The Amoruso Ranch Specific Plan plans two 24-inch water stubs which terminate at the edge of the City, on the western boundary of Placer Ranch. DEIR Appendix F, Figure 4-1 shows proposed 12-inch water mains that extend from this location on the City's boundary into the project site,

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| ultimately connecting to proposed 42-inch and 24-inch water mains further within Placer Ranch. The purpose of the interties is to provide backup water for “reliability and emergency,” as described in the master water plan. If there is need to feed the 42-inch water main, a 12-inch line will be undersized. Instead of reducing the line size, please revise the project to continue 24-inch lines from the City/Project boundary to the interties.   | 4-79<br>cont. |
| 68. Page 4.15-8. Add to recycled water section: “The recycled water system will require a re-evaluation of the recycled water availability at the time of connection. If improvements are needed, they should be paid for by the PRSP and SIA projects.”   | 4-80          |
| 69. Page 4.15-8, Add to recycled water section: “The City of Roseville will provide recycled water to customers on a first come first served basis. Placer County will be given an opportunity to reserve recycled water supply prior to PRSP/SAP development, as considered in the December 2009 South Placer Regional Wastewater Systems Evaluation Final Report.”   | 4-81          |
| 70. Page 4.15-8. The recycled water section of the DEIR must explicitly state whether recycled water demand for PRSP and SAP is within or exceeds the estimated peak day demand considered in the System Evaluation Study. Recycled water will be provided if adequate supply is available, but cannot be guaranteed above the amount contemplated in the study.   | 4-82          |
| 71. Page 4.15-9, Paragraph 1: The DEIR states that “Placer County 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.” This should be revised to reflect the fact that the SPWA partners (Placer County, Roseville and SPMUD), currently work together on the issues described in this sentence.   | 4-83          |
| 72. Page 4.15-12, 3rd Paragraph: This paragraph should disclose that the SPWA service boundary will be adjusted to include the entire PRSP and SAP. Please reference the study which shows that there is capacity for the additional flow in the sewer distribution system and at the PGWWTP.  | 4-84          |
| 73. Page 4.15-25, Wastewater section, Paragraph 1, sentence 1: The SPWA does fund regional wastewater facilities, but does not fund recycled water facilities.   | 4-85          |
| 74. Page 4.15-43, Impact 4.15-3. The net SAP PWWF is listed as 11.76 mgd, but is later listed as 8.49 mgd on page 4.15-45 (PRSP Area). This inconsistency should be corrected.   | 4-86          |
| 75. Page 4.15-46, Impact 4.15-3, the second paragraph talks about upsizing the 24-inch sewer line to a 27-inch sewer line. Neither the sanitary sewer master plan nor the hydrosience February 2018 technical memo talk about upsizing these lines. Is this still needed? If so, please add a mitigation measure requiring the development within the PRSP and SAP to construct and fund the upsizing of any sewer facilities.   | 4-87          |
| 76. Page 4.15-47, Impact 4.15-4. A calculation of current flows to the Pleasant Grove Wastewater Treatment Plant (PGWWTP) and the projected flow at buildout of the project are used to show there is capacity at the PGWWTP. Instead of using current flows, an evaluation of the South Placer Wastewater Authority (SPWA) <u>build out</u> flow conditions of the PGWWTP should be used to ensure that total flows at build out do not exceed ultimate capacity of the PGWWTP (24mgd), as this could require expanded capacity and associated environmental impacts that are not analyzed in the DEIR. | 4-88          |
| 77. Page 4.15-47, Impact 4.15-4. The flow for the PRSP and SAP used in this section are 1.99 and 3.78 MGD respectively. These flows do not match the sanitary sewer master plan flows of 2.047 and 3.23 MGD respectively (DEIR Appendix H, page 19).   | 4-89          |

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| 78. Page 4.15-48, Table 4.15-10 lists the SAP net ADWF as 3.782 MGD. This conflicts with the sanitary sewer master plan, Appendix H, which state 3.23 ADWF.  | I 4-90 |
| 79. In Appendix G, please remove references to the North Zone Pump Station. The intent is to provide recycled water through the line in Woodcreek Oaks Boulevard.  | I 4-91 |
| 80. In Appendix G, Section 4.3 Supply and Implementation: Please modify the first paragraph as follows: "...It should be noted that the recycled water supply for the project would be generated either at the Dry Creek or Pleasant Grove WWTPs, <del>though the majority of the recycled water sources are assumed to be from the Dry Creek WWTP....</del> " | I 4-92 |
| 81. In Appendix H, please remove references to the North Zone Pump Station. The City will determine the best way to provide recycled water to PRSP.  | I 4-93 |
| 82. In Appendix H, page 19 states that the Placer Ranch development will generate a total ADWF of 2.045 MGD. This conflicts with the flow stated on page 3 of the SSMP (2.17 MGD ADWF). Please fix the inconsistency.  | I 4-94 |

Letter 4	City of Roseville Kevin Payne, Assistant City Manager February 22, 2019
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- 4-1 The comment states that the Draft EIR analysis and mitigation measures are inadequate; however, the comment does not provide specific reasons specifying why the Draft EIR is inadequate. See responses below regarding the specific comments in this letter. Also, see Master Response 8: Recirculation.

Regarding the City's request to review the fiscal analysis and development agreements, the County has coordinated with the City of Roseville regarding these items. This is not an environmental issue and no further response is required regarding this issue.

Regarding the oral comments provided by the City's representative at the February 14, 2019, public hearing on the Draft EIR, see responses to comments PH-8 through PH-14.

- 4-2 The comment states that the Draft EIR conclusion regarding odor-related impacts is incorrect because the commenter asserts that payment of fair share fees is a feasible mitigation measure. See Master Response 4: Odors regarding the requirement of fair-share fees as mitigation for odor impacts and the feasibility of such mitigation.

The comment also notes that "the project analysis of landfill impacts is limited to an analysis based on the existing condition." Indeed, as explained on Draft EIR page 4-3, "the baseline conditions for this Draft EIR are generally the conditions that existed in the SAP area in 2016," consistent with State CEQA Guidelines Section 15125(a). The Draft EIR explains that "[t]his setting generally serves as the baseline against which environmental impacts are evaluated." Therefore, the Draft EIR properly analyzes impacts associated with the landfill against existing conditions.

In Table 4.0-2, on page 4-10, the Draft EIR lists the Western Placer Waste Management Authority Waste Action Plan as a cumulative project. Acreage and nonresidential square feet or acres are listed as "TBD." The discussion of cumulative impacts in an EIR must contain "[a] summary of the expected environmental effects" (State CEQA Guidelines Section 15130[b][4]). Section 15130(b) requires that the discussion "be guided by the standards of practicality and reasonableness." As indicated by Table 4.0-2, insufficient information is known about the expansion plans to consider it

in the cumulative impact analysis. As noted in comment 10-3, submitted by Churchwell White LLP on behalf of WPWMA, the “expansion plans remain highly conceptual and are not yet complete.” Therefore, the cumulative analysis in the EIR appropriately does not consider expansion of the WRSL in the cumulative impact analysis.

- 4-3 The comment states that the proposed project results in a significant traffic impact in Roseville by decreasing the number of signalized intersections in the City that operate at LOS C or better from 84 percent to 68 percent, which is lower than the 70 percent standard identified in the City of Roseville General Plan. The comment further states that the Draft EIR identifies improvements in mitigation measures, which are not currently identified in the City’s Capital Improvement Plan (CIP). The comment also expresses concern regarding the fair-share fee program approach identified in Mitigation Measures 4.14-3 and 4.14-4 of the Draft EIR.

The improvements not currently identified in the City’s CIP are generally not necessary when the timing of the proposed project, reasonably foreseeable regional roadway improvements, and forecasted land development are considered. Since the traffic generated by the proposed project would occur over an extended period of time, the impacts causing the need for these improvements would not occur until after reasonably foreseeable regional roadway improvements and forecasted land development are completed. These completed projects will result in substantially different travel patterns, which are captured in the cumulative plus project traffic analysis.

As shown in Tables 4.14-39 and 4.14-40 on pages 4.14-123 and 4.14-125 of the Draft EIR, the cumulative plus project traffic analysis shows that more than 70 percent of signalized intersections would operate at LOS C or better when reasonably foreseeable regional roadway improvements are considered. Since the proposed project would occur over an extended period of time, the cumulative plus project traffic analysis is a more realistic representation of the project’s traffic effects, particularly when considering the reasonably foreseeable roadway and land use projects that will also be completed at that time.

Fair-share funding for improvements at City of Roseville locations would be incorporated into the development agreement between Placer County and the landowner in the PRSP area. Placer County would work with the City of Roseville to determine this fair-share fee.

- 4-4 The comment suggests that the Foothills Boulevard extension should be a required project improvement. The comment expresses concern that the impacts to Fiddymment Road and Woodcreek Oaks Boulevard are underestimated in the Draft EIR. The comment also expresses concern regarding the timing and funding of the Foothills Boulevard extension.

The Foothills Boulevard extension is not included as part of the project and is not required to provide access to the PRSP area. As described on page 4.14-35 of the Draft EIR, access to the project is provided by several roadways independent of the Foothills Boulevard extension. However, Impact 4.14-1, Impact 4.14-3, and Mitigation Measure 4.14-1b acknowledge that the Foothills Boulevard extension is a necessary improvement to mitigate significant impacts to traffic operations in Placer County and the City of Roseville. As described on page 4.14-51 of the Draft EIR, the existing access routes into the project would provide sufficient access until 50 percent of the development in the PRSP area is completed, at which point traffic operations would be degraded to a significant level and the Foothills Boulevard extension would be necessary to provide an additional access point.

Significant impacts to Fiddymment Road and Woodcreek Oaks Boulevard south of the PRSP area are appropriately analyzed in the traffic analysis, as described in Impact 4.14-3 and Impact 4.14-4. The Draft EIR notes that project impacts to the intersections along these roadways would be significant without the Foothills Boulevard extension.

The timing of when the Foothills Boulevard extension is necessary is based on forecasted traffic levels on Fiddymment Road, Woodcreek Oaks Boulevard, Blue Oaks Boulevard, and Sunset Boulevard



at an interim year (2025). These interim year forecasts consider anticipated growth in the West Roseville and Sierra Vista Specific Plans, as provided by City of Roseville planning staff.

- 4-5 The comment suggests that the project as proposed would result in increased demands on City of Roseville services and recommends revised mitigation measures to ensure that the project would meet anticipated service demands, in order to avoid impacts to City of Roseville services and facilities.

Potential impacts related to increased demand for fire protection and emergency response services were evaluated in Impact 4.13-1 of the Draft EIR. Impacts were found to be potentially significant, and Mitigation Measures 4.13-1a and 4.13-1b would be implemented to reduce this impact. (See minor revision to Mitigation Measure 4.13-1b described in response to comment 3-15.) Mitigation Measure 4.13-1a requires the project proponent to annex into an existing CSA Zone of Benefit or create a CFD to fund the revenue required for operations, training, maintenance, and personnel costs associated with maintaining the staffing ratios identified in Table 4.13-5 on page 4.13-24 of the Draft EIR. This is required prior to recordation of the Final Subdivision Maps or approval of Improvement Plans for each property, whichever occurs first. Mitigation Measure 4.13-1b requires a minimum of two new fire stations to serve the net SAP and PRSP areas, the environmental effects of which are evaluated as part of the project. Mitigation Measure 4.13-1b requires construction of the fire stations based on need and maintaining staffing ratios; as mentioned in response to comment 3-15, Placer County Fire anticipates that the second fire station would be needed around 25 percent buildout of PRSP. These mitigation measures include timing and performance standards and would reduce impacts to a less-than-significant level.

Potential impacts related to increased demand for law enforcement services were evaluated in Impact 4.13-2 of the Draft EIR. The analysis noted that a sheriff's substation is currently identified in the Placer Vineyards Specific Plan area, approximately 5 miles southwest of the project area. While funding mechanisms would ensure that there is sufficient funding, impacts would be potentially significant because the funding mechanisms were not yet in place. Mitigation Measure 4.13-2 would be implemented to reduce this impact to a less-than-significant level and requires the project proponent to annex into an existing CSA Zone of Benefit or create a CFD to fund the revenue required for operations, training, maintenance, and personnel costs. Similar to Mitigation Measure 4.13-1a, this is required prior to recordation of the Final Subdivision Maps or approval of Improvement Plans for each property, whichever occurs first. The mitigation measure includes timing and performance standards and would reduce impacts to a less-than-significant level.

- 4-6 The comment suggests that the evaluation of parkland provides credit for private facilities not open to the public, does not include the residential uses within the SAP, and does not comply with Placer County standards.

Page 4.13-7 of the Draft EIR notes that the project area includes existing privately owned and operated recreational facilities. Goals and policies of the Placer County General Plan encourage the development of private recreational facilities, but do not allow for parkland credit for private facilities.

As discussed in Impact 4.13-5, development in the net SAP area would generate an estimate 6,095 new residents and would require development of 60.5 acres each of active parkland and passive recreation area, open space with public access, or paseos. Additionally, 6.1 miles of trails would be required for the net SAP area. While the exact location and characteristics of these areas cannot be known at this time due to the programmatic nature of the SAP, there is sufficient land within the net SAP area to provide the required parkland acreage. While there are no proposed parkland areas in the net SAP area at this time, parkland dedication consistent with Placer County requirements would be developed concurrently with new residential development (see General Plan Policy 5.A.23). Thus, while parkland for the net SAP area has not yet be identified, there is sufficient land and it is

anticipated that parkland dedication and development would occur concurrently with residential development in the net SAP area.

Table 4.13-10 of the Draft EIR presents information regarding the type of recreation facility, the acreage or mileage required, the acreage or mileage provided, the credit received for each and whether the PRSP would meet the requirements. The information presented in the table shows that the PRSP would receive credit for 309.9 acres but that only 132.2 acres is required. Thus, the PRSP would meet County General Plan requirements for parks and open space dedication.

- 4-7 The comment states that the Draft EIR did not consider the project's effects on the lifespan of the landfill or build-out flows of the Pleasant Grove Wastewater Treatment Plant. The Draft EIR included an evaluation of project-related impacts to WRSL capacity. Impact 4.14-6 concludes the impact is less-than-significant because, after the recycling and diversion requirements for construction waste in the net SAP area and PRSP area are met, a total of 192,695 cubic yards of construction waste would remain, which would be 0.8 percent of the remaining capacity at WRSL. The Draft EIR also evaluated the project's cumulative contribution (including full buildout of the PRSP area and net SAP area) to WRSL capacity and, with implementation of SAP and General Plan policies, the project's contribution to impacts related to WRSL capacity exceedance is considered less than significant. (See Cumulative Impact 4.15-17.) No mitigation measures are required. Regarding wastewater flows, Impact 4.14-4 evaluates potential impacts to water treatment services associated with "wastewater flows generated "by buildout of the PRSP and net SAP areas." Furthermore, Cumulative Impact 4.15-15 evaluates the project's contribution to wastewater treatment capacity issues associated with implementation of cumulative projects (see Table 4.15-14 in the Draft EIR). Mitigation Measures 4.15-4a and 4.15-4b require annexation into SPWA's and Pleasant Grove Wastewater Treatment Plant's (PGWWTP's) service areas and confirmation of infrastructure capacity and reduce the project's cumulative contribution such that the project's cumulative impact is less than significant. All of the issues raised by the commenter are fully evaluated in the Draft EIR, and no revisions are required.
- 4-8 The comment suggests that Mitigation Measure 4.9-1b is insufficient because it does not require payment of fees to the City of Roseville, establish or discuss operational and maintenance funding, or reference the Pleasant Grove Retention Facility. This is because the City's Pleasant Grove Retention Facility is not the only retention option identified in the Draft EIR and because the Draft EIR is clear elsewhere regarding the funding for the Pleasant Grove Retention Facility (should that become the selected retention option). As stated in Section 2.3 of the Draft EIR, if the County or developer seeks to utilize Roseville's regional detention facility, the party would enter into a Funding Agreement with the City of Roseville to determine fair-share fiscal impacts associated with utilization of said facility. Costs to participate in the Pleasant Grove Retention Facility would be negotiated with the City of Roseville as the basin is owned by the City of Roseville. Preliminary analysis was included within the EIR. Subsequent analysis may be needed.

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

See Master Response 6: Drainage and Flooding and also Master Response 9: Mitigation and Development Fees.

- 4-9 The comment states that the Draft EIR does not examine the project in light of the planned landfill expansion, nor does it require right-of-way dedication for Placer Parkway. See response to comment 4-2 regarding consideration of the landfill expansion in the cumulative impact analysis. See response to comment 4-25 regarding Placer Parkway right-of-way dedication.
- 4-10 The comment raises general issues regarding the visual impact analysis in the Draft EIR. Comment 4-35 provides a more detailed version of this comment. See response to comment 4-35.
- 4-11 The comment expresses concern regarding the timing of mitigation measures in relationship to the timing of project phasing and construction. The comment does not identify specific issues with specific mitigation measures. The Draft EIR identifies timing for mitigation measures. Also, while not clearly expressed, the comment appears to be related to the PRSP. Per Section 17.58.200 of the County's Zoning Ordinance, the County is requiring approval of a Development Agreement for the PRSP. The PRSP Development Agreement sets forth regulations that the PRSP would be subject to including provisions related to the timing and triggers for mitigation. The SAP is an area plan and therefore, rather than identifying specific development, it guides the general types and intensities of development within the Sunset Area. Therefore, specific development phasing is not included in the SAP, and, in many cases, timing of improvements cannot be as specifically identified as it can in the Development Agreement for the PRSP. As mentioned, however, the Draft EIR includes timing mechanisms as appropriate for mitigation measures. See the Mitigation Monitoring and Reporting Plan included as Chapter 4 of this Final EIR which more clearly presents the timing mechanisms identified in each mitigation measure.
- 4-12 The comment states that mitigation measures related to the City of Roseville Power Plant 2 (RPP2) do not include specific performance criteria to ensure adequate sound attenuation would be achieved. However, Mitigation Measure 4.11-4b on page 4.11-36 of the Draft EIR specifically states that noise from the RPP2, at future planned receptors, shall not "exceed Placer County land use compatibility standards (e.g., 60 A-decibels [dBA] Day-Night Sound Level/ Community Noise Equivalent Level [ $L_{dn}$ /CNEL] for residential uses), daytime and nighttime noise limits for sensitive receptors (i.e., 45 dBA Equivalent Continuous Sound Level [ $L_{eq}$ ]/65 dBA Maximum Sound Level [ $L_{max}$ ] [night], 55 dBA  $L_{eq}$ /70 dBA  $L_{max}$  [day])." The mitigation measure further requires that a sound wall be constructed between the existing power plant and future planned receptors that achieves, at a minimum, a 5-dB reduction in sound. The combination of noise standards and design criteria for the sound wall are specific performance criteria that would ensure future planned receptors are not exposed to noise levels that exceed applicable standards. Minor revisions to Mitigation Measure 4.11-4b were made in response to comment 4-50 below. See Chapter 2, "Revisions to the Draft EIR," for the specific text changes. These are also described in response to comment 4-50.
- 4-13 The comment expresses concern about the Draft EIR cumulative impact analysis. See Master Response 7: Program- vs. Project-Level Analysis for a discussion regarding the level of detail for the SAP and the PRSP. Regarding the level of detail of the cumulative traffic analysis, the Draft EIR (page 4.14-2) explains that because buildout of the SAP is anticipated to occur over an extended time period (i.e., 80+ years) based on current market forecasts, the current travel models with their 20-year horizons are not equipped to accurately forecast detailed traffic conditions associated with an 80+ year buildout timeframe. Therefore, this scenario is evaluated at a lesser level of detail, consistent with Section 15130(b) of the State CEQA Guidelines, in recognition of the higher level of uncertainty associated with this level of development and a timeframe that would occur well beyond 20 years. This scenario is intended to describe the overall cumulative travel effects of the buildout of the SAP using trip generation and ADT forecasts to provide a cumulative impact analysis. No additional traffic analysis is required. It should be noted, however, that in response to comments regarding development capacity 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.

- 4-14 This is primarily a repeat of comment 4-13. See response to comment 4-13, above.
- 4-15 The comment summarizes CEQA requirements for legally adequate mitigation measures and states that the Draft EIR must address and analyze specific mitigation measures for impacts to the City of Roseville. More detailed comments about specific mitigation measures in the Draft EIR are provided later in this letter. See the responses, below, to the more detailed comments. Also, see Master Response 9: Mitigation and Development Fees.
- 4-16 The comment requests that the EIR's list of required permits and approvals should include an agreement with the City of Roseville delineating fair-share obligations for impact to roadways within Roseville. These issues are addressed in the Development Agreement for the PRSP. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. This comment is noted for consideration.
- 4-17 The comment states that a City/County funding agreement is required prior to commencement of development that requires Placer County to provide funding for all costs associated with developing a stormwater retention/detention storage solution. Section 2.3, "Required Permits and Approvals," of the Draft EIR notes that an "agreement with City of Roseville for outlining fair-share obligations for off-site retention at the Pleasant Grove Retention Facility" would be required if the County elects to utilize this facility for retention. The comment is acknowledged and, as consistent with the statement in Section 2.3 of the Draft EIR, if the County or developer seeks to utilize Roseville's regional detention facility, the party would enter into a Funding Agreement with the City of Roseville to determine fair-share fiscal impacts associated with utilization of said facility. Note that County staff revised Mitigation Measure 4.9-1b as shown in response to comment 1-4.
- 4-18 The comment is seeking clarification on the type of rubberized concrete required by Mitigation Measure 4.11-5a and suggests that a process or program should be required to ensure regular maintenance of the rubberized asphalt concrete (RAC). In addition, the comment suggests that RAC should not be used on truck routes as it is much less effective in this application.

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.

Regarding regular maintenance of the RAC, as indicated in Mitigation Measure 4.11-5a, a design-level acoustical study would be prepared prior to the construction of new roadways. The acoustical study would consider and recommend feasible measures, which may include the use of RAC at that time, but this measure may not necessarily be implemented on every roadway where a noise impact has been identified. Similarly, if a noise impact were identified on a designated truck route then the acoustical study would ensure that appropriate noise-reducing measures are implemented. In addition, should RAC be implemented on certain roadways, like any other roadway within the county, regular maintenance and repairs would occur on an ongoing basis, as needed. The surrounding cities currently have funding programs in place to maintain city roads and transportation facilities and also would likely experience an increase in revenues related to increase in sales tax associated with visitor spending at shopping malls, restaurants and other establishments that generate revenue for the city. It should be further noted that according to CalRecycle, RAC can last up to 50 percent longer than traditional material, resulting in lower maintenance costs (CalRecycle 2018). No changes are necessary.

- 4-19 The comment erroneously refers to Mitigation Measure 4.13-8 on page 2-79 of the Draft EIR. As shown on page 2-79 and stated on page 4.13-42 of the Draft EIR, impacts related to consistency with applicable General Plan policies would be less than significant and no mitigation is required. Mitigation Measure 4.13-8 occurs on page 4.13-40 of the Draft EIR requires creation or annexation into a CFD for road maintenance. The surrounding cities currently have funding programs in place to maintain city roads and transportation facilities and also see an increase in revenues related to increase in sales tax associated with visitor spending at shopping malls, restaurants and other establishments that generate revenue for the city. Therefore, no additional mitigation is necessary.
- 4-20 The comment asserts that the widening of Sunset Boulevard identified in Mitigation Measure 4.14-1a needs to occur before the first building occupancy. As described on page 4.14-51 of the Draft EIR, approximately 25 percent of the development in the PRSP area could be developed before operations degrade to a significant level. This timing is based on forecasted traffic levels on Sunset Boulevard at an interim year (2025). These interim year forecasts consider anticipated growth in the West Roseville and Sierra Vista Specific Plans, as provided by City of Roseville planning staff.
- 4-21 See response to comment 4-4 regarding the extension of Foothills Boulevard.
- 4-22 The comment asserts that the impact fees identified in Mitigation Measure 4.14-3 should include the cost of timing new signals and retiming existing signals. Each agency controls and maintains traffic signals within their jurisdiction, which includes timing new signals and retiming existing traffic signals as part of their regular maintenance to respond to changes in traffic patterns.

- 4-23 The comment requests that fair share contributions in Mitigation Measure 4.14-10 include Placer Parkway. As described on page 4.14-50 of the Draft EIR, development within the PRSP and net SAP areas shall pay the applicable South Placer Regional Transportation Authority (SPRTA) fees. Development within the PRSP area will also be required to pay the Tier II Placer Parkway fee, which also provides funding for Placer Parkway. Development in the net SAP area is not subject to the Tier II Placer Parkway fee.
- 4-24 The comment requests that Draft EIR Exhibit 3-3 be updated to reflect the annexation of the Amoruso Ranch Specific Plan into the City of Roseville boundaries, which was approved by the Placer County LAFCO in December 2018. See revised Exhibit 3-3 in Chapter 2, “Revisions to the Draft EIR.” Throughout the Draft EIR, the Amoruso Ranch project is considered a City of Roseville project. Therefore, the minor official change in City of Roseville boundaries does not change any of the analysis or conclusions of the Draft EIR.
- 4-25 The comment indicates that objectives should integrate Placer Parkway. Chapter 3, “Project Description,” of the Draft EIR notes on page 3-21 that “because an EIR was certified for Placer Parkway and the project was approved, this EIR evaluates impacts of Placer Parkway in a cumulative context only and not as a project-specific element.” The proposed Placer Parkway project corridor was selected following the completion of a Final Tier I environmental review (FHWA-CA-FEIS-2009-46 and SCH No. 2003092069) to select and preserve a 500- to 1,000-foot-wide corridor. The preferred alternative would connect SR 99 at Sankey Road to SR 65 at Whitney Ranch Parkway (South Placer Regional Transportation Authority 2009).

The Final Tier I review was completed on December 3, 2009 when the South Placer Regional Transportation Authority (SPRTA) Board certified the Final Program EIR and adopted Findings, a Statement of Overriding Considerations, and a Mitigation Monitoring and Reporting Program for CEQA compliance (SPRTA Board Resolution #09-06). The SPRTA Board also selected the Placer Parkway Corridor – Alternative #5 with a No-Access Buffer (SPRTA Board Resolution #09-07). On May 7, 2010, FHWA completed the Record of Decision for NEPA, selecting Alternative #5 as the preferred alternative.

A Project Study Report–Project Report (PSR-PR) was completed and approved on September 29, 2010 (EA 03-2C5900) for the Whitney Ranch Parkway connection at SR 65. Whitney Ranch Parkway is the easterly extension of Placer Parkway beyond SR 65. This included a Type L-7 partial cloverleaf interchange for the southbound ramps and a Type L-2 spread diamond interchange for the northbound ramps with a three-lane overcrossing connecting the two sides. Northbound and southbound auxiliary lanes between Sunset Boulevard and Whitney Ranch Parkway were proposed along SR 65 to improve the operations. Each on-ramp would include provisions for ramp metering and an HOV preferential lane. A Supplemental PSR-PR, completed in October 2013, stages the interchange into two phases. The interim interchange includes the off-ramp and slip on-ramp to northbound SR 65, the loop on-ramp to southbound, and a three-lane overcrossing of SR 65. The auxiliary lanes, the southbound diagonal on-ramp and off-ramp, and widening of the overcrossing are deferred until the Placer Parkway Phase 1 Project was constructed.

A cooperative agreement between the City of Rocklin and the State of California was executed on October 24, 2013 to cover work on Plans, Specifications, and Estimate (PS&E), and right-of-way efforts for the Whitney Ranch Parkway Interchange. The interim phase of SR 65/Whitney Ranch Parkway (Placer Parkway) completed construction and was opened to traffic in 2016.

A Project Study Report – Project Development Support was completed and approved on June 1, 2012 (EA-2F920K) for the Placer Parkway Phase 1. The Placer County Board of Supervisors completed CEQA approvals by adopting the Initial Study/Mitigated Negative Declaration (IS/MND) for Placer Parkway Phase 1 on September 1, 2015. A Categorical Exclusion (CE) for NEPA approval was obtained on June 15, 2017. The Final Project Report was approved for Placer Parkway Phase 1 on August 23, 2017.

The Placer Parkway Phase 1 Project also includes the following elements:

- ▲ a four-lane grade-separated structure over Industrial Avenue and UPRR tracks,
- ▲ a new at-grade connection at Foothills Boulevard,
- ▲ a four-lane extension from SR 65 to Foothills Boulevard with a striped median, and
- ▲ widening of Whitney Ranch Parkway from SR 65 to University Avenue to six lanes.

The SR 65/Placer Parkway/Whitney Ranch Parkway interchange is an integral component of the ultimate Placer Parkway project. The project would include a standard L-9, partial cloverleaf interchange at SR 65. Improvements to the interchange include the following elements:

- ▲ widening the SR 65 overcrossing to six lanes,
- ▲ widening the southbound off-ramp,
- ▲ adding a southbound on-ramp,
- ▲ widening the northbound off-ramp,
- ▲ adding a northbound loop on-ramp, and
- ▲ adding auxiliary lanes between the interchange and the Twelve Bridge Drive interchange.

As noted on page 3-32 of the Draft EIR,

Future development that would occur with implementation of the PRSP would be consistent with the land use designations, which are described individually below and summarized in Table 3-4, and would comply with the Placer Ranch Development Standards, a companion document to the PRSP. The development standards provide the specific zoning regulations for land development projects and contain details regarding permitted uses, yard setbacks, site coverage, building height, and other similar restrictions. In addition, the Placer Ranch Design Guidelines provide specific design expectations for development projects within the PRSP area.

Placer Parkway right-of-way is identified on the PRSP Land Use Plan (Figure 4-1 in the PRSP Specific Plan documents) and Exhibit 3-11 in the Draft EIR. Parcel PR 200 is identified as Placer Parkway with approximately 158.51 acres identified (Table 4-1 PRSP Specific Plan) and Placer Parkway right-of-way estimates are noted in the Draft EIR Table 3-4. The PRSP Development Agreement defines the timing and triggers associated with dedication of right-of-way.

Section 4.6 of the SAP Corridor Design Standards and Guidelines also provides additional corridor guidelines for Placer Parkway.

- 4-26 The comment notes that Table 3-3 in the Draft EIR does not list any housing units for residential development that could be built within the commercial and industrial zones. The comment requests that because the project includes allowances for up to 30 units per acre in these zones, the table should be amended to show the amount of residential development assumed, most notably the residential assumptions used in the traffic study for these zones. The traffic scenario “Projected 20-Year Development” for the “SAP Area, Excluding PRSP,” is based on the EPS market analysis as described on page 3-27 of the Traffic Impact Study (included as Appendix M of the Draft EIR). The market analysis found that the vast majority of residential development within the 20-year timeframe is anticipated to occur in other areas within the region that are specifically designated for residential uses, including approved specific plans in Roseville, Rocklin, and Lincoln. This is reflected in the cumulative traffic analysis, as described on page 4.14-94 of the Draft EIR. The market analysis did forecast that within the 20-year buildout, 320 residential dwelling units could be expected in the SAP area, excluding the PRSP area. This is illustrated in Table 3-3 of the Traffic Impact Study.
- 4-27 The comment suggests that Exhibit 3-7 in the Draft EIR project description should be modified to show widened sections of Foothills Boulevard and Industrial Avenue within the City of Roseville and that this widening should be figured into the project cost and/or accounted for in the mitigation fee.

Exhibit 3-7 illustrates the circulation diagram for the roadway network within the SAP. This diagram is not intended to show the entire mitigated roadway network in the region and therefore no revisions are necessary.

- 4-28 The comment requests additional information for bus rapid transit (BRT). Page 3-26 of the Draft EIR (identified by the commenter) provides a summary of the transit features included in the SAP policies. Page 3-49 of the Draft EIR includes more specific transit features identified in the PRSP. Exhibit 3-18 in the Draft EIR illustrates locations for bus pullouts and shelters, including a conceptual route for BRT in the project area. Also, the project is required to prepare a transit master plan in which the detailed elements of the transit system would be provided.
- 4-29 The comment states that the City of Roseville will need to determine which plant or plants would deliver recycled water to the project, as noted in the fourth paragraph on page 3-55 of the Draft EIR. (The text referenced in the comment occurs on page 3-53 of the Draft EIR.) The comment notes that the plant or plants will be chosen based on capacity and that it would be premature to determine which one would be selected. The comment raises the general topic of recycled water does not identify any specific issues with the analysis provided in the Draft EIR. The project's potential recycled water impacts are addressed in the Draft EIR in Section 4.15, "Utilities," and mitigation measures to reduce potentially significant impacts are identified therein.
- 4-30 The comment suggests that there is a discrepancy between the average dry weather flow (ADWF) identified on page 3-55 of the Draft EIR, in the master sewer plan, and in Section 4.15, "Utilities," of the Draft EIR. The Draft EIR (page 4.15-66) explains the reason for the two ADWF numbers: "the Systems Evaluation estimated flows from the PRSP area development to be 2.17 million gallons per day (mgd) ADWF (RMC Water and Environment 2009:3-5 and 3-6). Development in the PRSP area is anticipated to generate an estimated 1.99 mgd ADWF, which is lower than the wastewater flows anticipated by the Systems Evaluation." No revisions to the Draft EIR are needed.
- 4-31 The comment suggests various considerations for the fees for Pleasant Grove Retention Facility. See response to comment 4-17.
- 4-32 The comment suggests that the segment of Foothills Boulevard within the City should be included in the discussion contained on page 3-64 of the Draft EIR. In addition, the comment states that the Draft EIR references the Foothills Business Park Annexation EIR but that document contained a different alignment and number of lanes, so it cannot be entirely relied on. The list of supporting infrastructure included on page 3-64 of the Draft EIR is limited to those projects that are required as part of the PRSP project but that are located outside of the PRSP area and were assumed to be included as part of the project description. The extension of Foothills Boulevard is required as mitigation as discussed on page 3-79 of the Draft EIR as part of the "Off-site Roadway Widening and Extension Identified as Mitigation" section and not included in the project description and therefore is not appropriate to list in this section of the document.

The alignment of Foothills Boulevard is consistent with the alignment included in the Foothills Business Park Annexation EIR. In addition, the Foothills Business Park Annexation EIR (page 4.5-34) identifies the Foothills Boulevard extension as a four-lane facility. However, the right-of-way width approved as part of the Foothills Business Park Annexation project (100-foot right of way per City's standard plan for a major arterial [ST-9]) is appropriate to accommodate the six-lane facility required as mitigation in the Draft EIR for the SAP/PRSP. It is therefore expected that there is sufficient right-of-way in the area evaluated in the previous EIR to accommodate the future roadway.

- 4-33 The comment suggests that the reference on page 3-69 of the Draft EIR to the Pleasant Grove Retention Facility fee program should note that a mechanism is in place to fund all associated costs for property acquisition, environmental review, design, construction, operation, and maintenance. In response to this comment, 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.

- 4-34 The comment notes that Foothills Boulevard is listed as a four-lane arterial on page 3-79 of the Draft EIR and in other sections of the document it is identified as a six-lane facility and requests fees for off-site mitigation of Blue Oaks Boulevard and Roseville Parkway. The section of the Draft EIR referenced containing the four-lane arterial is for the PRSP, which requires Foothills Boulevard as a four-lane arterial. Foothills Boulevard is identified as a six-lane facility for the SAP, which is consistent with the Draft EIR's description and analysis.

Section 4.14, "Transportation and Circulation," of the Draft EIR did not identify significant impacts on Blue Oaks Boulevard or Roseville Parkway; therefore, no mitigation was identified for the project. No revision to the Draft EIR is required.

- 4-35 The commenter asserts the update to the SAP will substantially increase development potential over the existing SIA Plan. To clarify, the baseline conditions for the environmental analysis under CEQA are the current conditions at the project area, as described in Draft EIR Section 4.0.3, "Baseline"; the baseline for the environmental analysis is not the buildout or planned development under the SIA Plan.

The commenter suggests that the absence of photosimulations from Viewpoint 6 in Roseville makes it difficult to understand the scope of visual impacts. While the comment is acknowledged, it is also true that, because no specific project developments are proposed or would be approved with adoption of the SAP and PRSP, photosimulations that depict specific development would be premature and potentially misleading. Moreover, CEQA does not require visual simulations. Rather, the content, level of specificity, and degree of detail for the aesthetics analysis are dictated by several State CEQA Guidelines sections. For example, Section 15146 requires that the degree of specificity required in an EIR correspond to the degree of specificity involved in the underlying activity described in the EIR, and Section 15145 indicates that a lead agency need not evaluate an impact that would be too speculative. As explained in this response to comment, visual simulations are not necessary to evaluate impacts, and visual simulations would require speculation.

Views from the city of Roseville would be of the PRSP area because the city is adjacent to the southern border of the PRSP area. As described in Draft EIR Section 4.0.1, "Program- and Project-Level Environmental Review," the PRSP is evaluated in the EIR at a project level. An evaluation of the visual change at Viewpoint 6 is provided on Draft EIR page 4.1-23, which states:

This area would have low-density single family homes around a central park space. It is unlikely that an area slated for development of residential uses could be designed to maintain rural character of the PRSP area consistent with *Placer County General Plan Policy 1.0.4....* Visual character would change from dominantly agricultural/grazing land to residential. Unity would increase to moderately high because the view would contain all residential development that would be consistent with proposed Placer Ranch Development Standards and Design Guidelines, though design of new homes may not be consistent with the design of the existing development partially visible from Viewpoint 6. Similarly, because of the homogeneity of development, there would be minimal intrusions that are not consistent with the visual characteristics of residential development. Therefore, intactness

would be moderately high. Although visual quality would increase, impacts would be potentially significant because of the substantial change in visual character where the PRSP proposes development in areas where there is some existing development but agricultural/grazing land is visually dominant.

Therefore, consistent with the State CEQA Guidelines direction on level of detail and speculation, the Draft EIR describes that the area seen from Viewpoint 6 would contain single-family homes that are designed consistent with the proposed Placer Ranch Development Standards and Design Guidelines. More detail about the appearance of homes and the development would be required to create an accurate visual simulation of the view from Viewpoint 6.

Providing additional descriptions of the appearance of homes, such as design, layout, or color, would be speculative. Such specifics would be chosen by the developer at the time of obtaining subsequent development entitlements, which are not currently being sought. By extension, creating a visual simulation that is accurate would require speculation. Therefore, the EIR does not contain photosimulations, and the analysis is adequate under CEQA. Furthermore, the commenter does not explain why the written analysis without photosimulations makes it difficult to understand the scope of the impacts; therefore, no additional response to this part of the comment can be provided.

The commenter also states that a view's quality and the impact on the view's quality depend on viewing location and viewer group observing the view. To clarify the approach used in the Draft EIR for assessing visual quality, visual quality is determined through an evaluation of vividness, intactness, and unity, as described on Draft EIR page 4.1-2. And, as described on Draft EIR page 4.1-14, the following factors are considered in evaluating visual impacts:

- ▲ existing visual qualities of the affected environment and specific changes to its visual character and qualities;
- ▲ the visual context of the affected environment;
- ▲ the extent to which the affected environment contains place or features that provide unique visual experiences or that have been designated in plans and policies for protection or special consideration; and
- ▲ the sensitivity of viewers, access of viewers, their activities, and the extent to which these activities are related to the aesthetic qualities affected by the project-related changes.

The commenter claims the viewpoints included in the Draft EIR are not representative of viewpoints observed by the public in those locations, that the photos do not represent actual views, and that the photos ensure there are encroachments in the foreground to distort the actual view. As explained on Draft EIR page 4.1-5, the key viewpoints “represent typical views in the project area and provide an overall sense of the visual setting of the project area and a basis for describing the range of impacts that would occur with project implementation.” The Draft EIR further explains on page 4.1-5 that “[t]he viewpoints are not intended to identify important views or specific visual characteristics.”

Much of this response focuses on Viewpoint 6 because the commenter uses Viewpoint 6 as an example. The commenter is correct that some photos contain encroachments in the foreground; however, these encroachments are common and therefore appropriately and accurately included in the photographs from key viewpoints. Consistent with the Placer County General Plan goals and policies (e.g., Policy 1.O.3, Policy 1.K.3, and Policy 1.O.10), the analysis in the Draft EIR focuses on public views. Most of the portion of Roseville area adjacent to the PRSP area contains private residential development. Other than Viewpoint 6, public views of the PRSP area from Roseville are located at dead ends that are unlikely to be visited by substantial numbers of viewers. Public viewpoints from Roseville of the PRSP area include a portion of a pedestrian pathway from Brick Mason Circle that dead-ends at the PRSP area, a dead end of Grove Hill Way, Fiddymont Road (Viewpoint 6, which continues through the PRSP area), and a dead end of Woodcreek Oaks Boulevard. Therefore, the view from Viewpoint 6 is the most representative viewpoint of the PRSP

area from Roseville because it is the public point from which most viewers in Roseville would see the PRSP area. The description of Viewpoint 6 on Draft EIR page 4.1-12 notes encroaching elements such as a power line and road in the view of the PRSP area. Therefore, the encroaching elements are a representative component of public views from Roseville of the PRSP area. Therefore, no additional viewpoints need to be identified in response to this part of the comment.

As to the commenter's claim that the photo from Viewpoint 6 has been distorted by the viewpoint's positioning further back from the end of the road or sidewalk, making it inaccurate for views from Roseville, Viewpoint 6 as it is currently located is indeed the most accurate to represent public views in Roseville on Fiddymment Road. Most viewers on Fiddymment Road within Roseville would indeed see suburban visual elements, such as light standards. Only when drivers or pedestrians are at the border of Roseville about to enter the PRSP area would these elements possibly not be within their view because suburban development occurs up to the city limits. A photo from Fiddymment Road without suburban elements would not be representative of the typical motorist or pedestrian view on Fiddymment Road in Roseville toward the PRSP area. Rather, a view with suburban visual elements is most representative of public views of the PRSP area from Fiddymment Road in Roseville. The commenter has not identified any specific viewpoints that should be considered in the Draft EIR; therefore, no additional response needs to be provided.

The commenter asserts that the conclusion that vividness, unity, and intactness are low has "very little explanation" and that the unity and intactness conclusions are based on an "assumption" that the foreground contains urban residential elements. On page 4.1-12, the Draft EIR explains:

Vividness is low because there are no distinct visual patterns or elements. The view has low unity because of the lack of integration of residences into the grazing area and the resulting abrupt transition. The intactness is low because modern residential developments are not a common visual intrusion associated with grazing areas.

Therefore, the conclusion about vividness, unity, and intactness at Viewpoint 6 are supported by explanation. Regarding the assertion that the conclusions are based on an "assumption" about residential elements in the foreground; to clarify, Viewpoint 6 indeed contains encroaching residential elements in the foreground. Relatedly, the commenter states the Draft EIR's conclusion regarding unity and intactness are based on incompatible urban residential elements in the foreground. However, the Draft EIR does not state that the residential developments are incompatible; rather, the Draft EIR states that the residences are not integrated and result in an abrupt transition with the grazing area and that modern residential developments are not a common visual intrusion associated with grazing areas. In addition to the fact that there are residential elements in the foreground, this viewpoint is the most representative of public views of the PRSP area from Fiddymment Road in Roseville, as explained previously. Therefore, no revisions have been made to the Draft EIR in response to this portion of the comment.

The commenter states that city residents who live and travel on the southern boundary of the project area have significant views of the Sierra Nevada. The Draft EIR recognizes visibility of the Sierra Nevada foothills and mountains on page 4.1-2: "[t]he Sierra Nevada foothills and mountains of the Sierra Nevada are visible east of the project area." The Draft EIR also explains why the Sierra Nevada is not a significant visual feature, contrary to the commenter's claim that it is: "[T]he Sierra Nevada is not a dominant feature because of distance and atmospheric haze." Additionally, despite the commenter's claim that future development would block views of the Sierra Nevada, such a conclusion is uncertain and speculative. As previously described, CEQA does not require speculation in evaluating impacts. Heights and locations of buildings that would be constructed within the project area cannot currently be known because there are no development proposals for consideration. Whether a taller building would block a public view is dependent on viewer location, building height, building size, and, in the case of views of the Sierra Nevada, atmospheric haze. Without this information, an analysis of whether development would block the Sierra Nevada would require

speculation. Therefore, no revisions to the Draft EIR have been made to change its conclusion about the significance of this aesthetic impact.

- 4-36 It is unclear whether the comment is stating that there are many odor complaints within 1 mile of the WRSL or that with a buffer of 1 mile there are in total many odor complaints. To clarify, Exhibit 4.3-1 shows odor notifications attributed to WRSL facilities and reported to WPWMA from 2012 through 2017, and most of the complaints originated more than 1 mile from the WRSL parcels.

The comment suggests that the Draft EIR “more fully” address impacts of the landfill buffer reduction, and the comment mentions exacerbation of odor impacts. See Master Response 4: Odors for a discussion of the Draft EIR analysis of odor impacts and revisions that have been made to the analysis. The comment requests only that more discussion be provided and does not specify what part of the analysis the commenter finds insufficient or what should be added. The County believes that the analysis as described in Master Response 4 is sufficient under CEQA; therefore, no revisions have been made to the Draft EIR regarding the impacts of the landfill buffer reduction.

- 4-37 The comment raises issues related to the WRSL expansion. See response to comment 4-2.

- 4-38 The comment states that the Draft EIR concludes that mitigation is infeasible because odor impacts are subjective. Master Response 4: Odors explains that the WPWMA Odor Mitigation has now been made a mitigation measure (Mitigation Measure 4.3-6a); however, the mitigation is still infeasible because the County cannot enforce the creation of a fee program or the implementation of the improvements, as explained in Master Response 4.

- 4-39 The comment states the Draft EIR does not mention potential impacts to the City of Roseville wetland preserve areas adjacent to the project and that the County should manage open space areas contiguous with City preserves consistent with the City of Roseville Open Space Preserve Overarching Management Plan (August 5, 2011), submit improvement plans to the City of Roseville for their review and comment, install masonry walls or closed fencing adjacent to City preserves, and design drainage systems so they do not discharge to City preserve areas.

The Draft EIR shows the City’s preserve areas in Exhibit 4.4-1. The PRSP land use plan includes open space preserve in the southwest corner of the site that would connect to City preserve areas; however, low-density residential land use is also planned in this area. Indirect impacts to off-site wetlands are addressed on the Draft EIR (page 4.4-37). Although, the Draft EIR does not quantify the acreage of off-site wetlands, the Draft EIR acknowledges on page 4.4-45 that vernal pool wetlands within 250 feet of proposed development may be subject to indirect effects unless the immediate watershed can be demonstrated to be smaller than 250 feet. This includes wetlands within the City’s preserve areas. Providing the specific wetland acreage would not change the impact conclusions. Also, because the potential impacts would be indirect, even if the specific number of existing vernal pool wetlands were provided, it would not be possible to provide the same level of precision related to the indirect impacts to those wetlands. Rather, the Draft EIR identifies policies that are protective of these areas and identifies mitigation measures to protect these features from indirect impacts.

Several SAP policies and programs are protective of aquatic resources, habitats, and species, including Policy NR-1.1 through NR-1.4, Program NR-4, Policy NR-2.1, Program NR-5, Policy NR-2.3, Policy NR-2.4, Policy NR-2.5, Policy NR-3.1, Policy NR-3.3, Policy NR-3.4, Policy NR-3.5, Policy NR-3.10, Policy NR-4.1, Policy NR-4.2, and Policy NR-4.4. The full text of these policies and programs is provided in the Draft EIR (pages 4.4-31 through 4.4-34). Of these policies and programs, the ones that most specifically address indirect impacts related to construction and operation of the project on vernal pool habitat in City preserves, include SAP Policy NR-2.5, “Setback Area Protection and Maintenance,” which requires no development projects to include provisions within setback areas that are designed to protect natural resources, including prohibition of the placement of fill during or after construction, establishment of a buffer area, and protection of vegetation within the buffer during construction. The policy requires long-term covenants for the protection and maintenance of

setback areas. Regarding operational impacts, SAP Policy NR-3.5, “Stream Protection Best Management Practices and Low Impact Development,” requires the use of feasible and practical best management practices (BMPs) and LID strategies (strategies that promote natural movement of stormwater through preservation of natural landscape features and minimization of impervious surfaces) to protect streams from the adverse effects of construction activities and urban runoff. The policy further requires that LID strategies, which focus on minimizing adverse effects on water quality and surface water runoff, be incorporated into project design. This would reduce potential impacts related to stormwater outfall within existing City preserve areas.

In addition, mitigation for indirect impacts is offered on page 4.4-47 of the Draft EIR, including: “No project construction shall proceed in areas supporting potential habitat for federally listed vernal pool invertebrates, or within adequate buffer areas (250 feet or lesser distance deemed sufficiently protective by a qualified biologist with approval from USFWS), until a biological opinion (BO) and incidental take authorization has been issued by USFWS and the project proponent has abided by conditions in the BO, including all conservation and minimization measures.” This measure would apply to development that could have potential to affect wetlands in the City’s preserve areas.

Therefore, protection measures are already required for wetlands within the City’s adjacent preserve areas. No revision to the Draft EIR is needed. However, in response to public comment, the County has added the following policy to the SAP to further protect adjacent wetlands:

- ▲ **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-up

L. Post-construction remediation construction impacts as needed

- 4-40 The comment requests that measures consistent with Section 5.2 of the *City of Roseville Open Space Preserve Overarching Management Plan* (provided as an attachment) be incorporated to mitigate potential impacts to biological resources in City preserves adjacent to the PRSP area. See response to comment 4-39.
- 4-41 The comment requests that the County agree with the City that the term “future development” is equivalent to “all SAP and PRSP development” that is reasonably foreseeable, with no exclusions. Page 4.9-22, “Methods and Approach,” of the Draft EIR states, “In determining the level of significance, the analysis assumes that the SAP, including the PRSP, and future developments implemented through these planning documents would comply with relevant federal, state and local ordinances and regulations.” Therefore, the Hydrology and Water Quality section is consistent with this interpretation.
- 4-42 The comment states that the EIR does not, but should, evaluate whether the project would create any increase in off-site stormwater flows that would impact areas known as the Gleason’s and Amoruso Estates. The comment also states that the flows from the PRSP and net SAP areas would be conveyed through the City’s Amoruso and Creekview Specific Plan areas and that additional impacts due to increased peak flows have not been analyzed, particularly before the improvements for these off-site downstream receiving facilities have been constructed. Appendix I for the PRSP, Master Drainage Report, provides a comparison of pre-project to post-project peak flows at the downstream edge of the PRSP property for various design storm event frequencies as required by the Placer County Stormwater Management Manual. As development projects in both the net SAP and PRSP areas are submitted for County review, County staff would require a project-specific final drainage report that would include analysis of the project’s impacts to downstream properties including the effects of the proposed improvements and changes in peak flows and patterns per Placer County General Plan Policy 4.E.11. Additionally, Mitigation Measure 4.9-1b (see revisions shown in response to comment 1-4) requires projects in both the net SAP and PRSP areas to provide project-specific retention and detention. Projects would reduce post-project peak flows to less than pre-project peak flows by providing on-site detention. Projects would also be required to retain project-specific volumetric stormwater increases either on-site, or by participating in a regional stormwater retention program, once established. The project-specific final drainage report would be prepared in conformance with the Placer County Land Development Manual and Stormwater Management Manual and would be submitted with each project’s improvement plans for review and approval by the County. Therefore, off-site stormwater flows would not result in substantial flooding-related impacts in the off-site areas identified in the comment.
- 4-43 The comment states that, because stormwater flows from the PRSP area were not contemplated in the City of Roseville’s EIR for the Pleasant Grove Retention Facility project, Mitigation Measure 4.9-1b is not sufficient for the PRSP area and that additional environmental review would be needed before the Retention Facility can be constructed. The Draft EIR (page 3-69) states that although the City’s proposed volumetric retention basin was evaluated at a program level in an EIR prepared by the City, the SAP/PRSP project would require expansion of the facility beyond its current approved design. This EIR evaluates the potential environmental impacts associated with a larger retention facility. The Draft EIR further states that the City of Roseville, or County/City JPA (or other agreement)

would be the CEQA lead agency for the Pleasant Grove Retention Facility project, and additional CEQA review would be required before the facility could be constructed. Therefore, the Draft EIR appropriately evaluates the potential impacts associated with the Pleasant Grove Retention Facility, and notes that additional CEQA evaluation will likely be necessary for the City of Roseville as lead agency to implement. Acknowledgment of the fair-share development fee is provided under response to comment 4-17. Note that County staff revised Mitigation Measure 4.9-1b as shown in response to comment 1-4.

4-44 The comment states that Mitigation Measure 4.9-1b should be revised to acknowledge that fair-share development fees associated with development of the Pleasant Grove Retention Facility should be required. The comment also provides suggested language to be added to Mitigation Measure 4.9-1b. See response to comment 4-43, above, regarding Mitigation Measure 4.9-1b.

4-45 The comment provides a minor correction to a construction timing statement. In response to this comment, 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)~~, (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.)

This correction provides minor clarification and does not change the analysis or conclusions of the Draft EIR.

4-46 The comment recommends that the County add a statement to the end of Mitigation Measure 4.9-1a to require public review period comments to be addressed within the final drainage report. Public review period comments are addressed in this Final EIR. No change to mitigation measure language is necessary.

4-47 The comment states that the EIR should be revised to disclose the location of the project area's existing 100-year floodplain in order to fully analyze the potential downstream impacts in the City of Roseville. Further, the comment suggests revisions to SAP Policies PFS-5.6 and NR-3.2 regarding future floodplain mapping. The net SAP area was analyzed at a programmatic level and thus does not contain the level of detail regarding project-specific development needed to determine impacts

to the floodplain. Mitigation Measures 4.9-1a, 4.9-1b, and 4.9-5a -5c address impacts to the floodplain by requiring that a project-specific drainage report be submitted with any improvement plans and that project-specific detention and retention requirements be satisfied. Note that County staff revised Mitigation Measure 4.9-1b as shown in response to comment 1-4.

The PRSP area was analyzed at a project level. A master drainage report was prepared and included as Appendix I. Plate 2 of Appendix I depicts the existing 100-year floodplain. Plates 4 and 5 depict the proposed 100-year floodplain as mitigated and unmitigated, respectively.

The SAP includes areas of the Federal Emergency Management Agency (FEMA) Special Flood Hazard Area Zone A, for which the floodplain elevations are not yet determined. The net SAP area was analyzed at a programmatic level and mitigation measures are included to ensure that future project submittals are analyzed at a project level that address the commenter's concerns. SAP Policy NR-3.2: Floodplain Compliance, states, "The County shall require all development in the FEMA or calculated 100-year floodplain to comply with the provisions of the Placer County Flood Damage Prevention Ordinance." This Ordinance provides for definitions to calculate the limits of the floodplain. The use of "100-year future, fully developed floodplain" requirements in the Pleasant Grove Creek area has largely been modified because of the nature of the watershed being undeveloped prior to development. Project-specific versions of this analysis are generally created and utilized as a significant amount of the detention/attenuation in this watershed occurs naturally. The project does propose to expand the development parameters of future studies to include the developed areas of these projects.

Policy PFS-5.6 was drafted based on past discussions between County and City staff regarding the Pleasant Grove Retention Facility. Utilization of the current 100-year, 8-day storm methodology references a 1998 agreement between Sutter County and the City of Lincoln, but the policy identifies the possibility that a different, agreed-upon methodology could be used. County and City staff recognize that further future discussions are needed between the various jurisdictions in order to determine the appropriate agreed upon methodology referred to in Policy PFS-5.6.

- 4-48 The comment requests verification that Appendix D of the Draft EIR includes all updated Volumetric Retention Studies. Appendix D includes the following Volumetric Studies: North Canal Tributaries Mitigation – Lakeview Farms at Coon Creek dated September 25, 2017; Placer Ranch Onsite Mitigation dated September 19, 2017 and revised on September 26, 2017; North Canal Tributaries Mitigation – Scilacci Farms at Coon Creek dated September 20, 2017 and revised on September 26, 2017; Pleasant Grove Creek – Regional Volumetric Mitigation dated September 18, 2017 and revised September 26, 2017 and September 29, 2017. These are the correct technical studies.
- 4-49 The comment states that the Draft EIR conclusion regarding odor-related land use impacts is incorrect because the commenter asserts that payment of fair share fees is a feasible mitigation measure. Master Response 4: Odors explains that the WPWMA Odor Mitigation has now been made a mitigation measure (Mitigation Measure 4.3-6a); however, the mitigation is still infeasible, as explained in Master Response 4. Regarding analysis of potential landfill expansion, see response to comment 4-2.
- 4-50 The comment states that mitigation measures related to the RPP2 on page 4.11-34 of the Draft EIR do not include specific performance criteria to ensure adequate sound attenuation. The comment further suggests that the mitigation should include additional requirements for the specific plan developers to be responsible for mitigation, for the sound wall to comply with City of Roseville Construction Standards, and that the mitigation measure should be revised to specify Placer County noise standards be achieved.

As discussed in response to comment 4-12, Mitigation Measure 4.11-4b on page 4.11-36 of the Draft EIR provides specific performance criteria (i.e., Placer County noise standards) to ensure noise levels at future planned receptors would not disturb sensitive land uses or exceed Placer County noise standards. After additional consideration, Mitigation Measure 4.11-4b was revised to remove



the 5-dB reduction requirement for the sound wall and rely on the performance criteria of achieving the Placer County noise standards. 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 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.

As discussed on page 4.11-36, the only noise standard that is currently being exceeded at locations where future receptors could be placed is the Placer County nighttime standard of 45 dBA  $L_{eq}$ . A reduction of 5-dB would ensure that all Placer County noise standards are achieved. Further, the mitigation specifically identifies the project proponent as the responsible party for implementation of mitigation related to the RPP2. Finally, the project is located within Placer County and mitigation has been incorporated that ensures the noise levels from the existing RPP2 would not exposure future planned receptors within Placer County to noise levels that exceed applicable noise standards. Considering the project is within Placer County and not the City of Roseville, the design of the sound wall would be subject to County approval, not City of Roseville approval. Placer County would ensure that construction of the sound wall meets all requirements set forth by Mitigation Measure 4.11-4b and applicable Placer County code. No changes are necessary.

- 4-51 The comment states that the City of Roseville is currently providing a disproportionate level of service for calls in Placer County to backfill services in the SAP area and this effect on City of Roseville fire services is not addressed in the Draft EIR. The comment further suggests that the mitigation measures be revised to include performance standards for determining the effectiveness of the mitigation measure and that additional information regarding timing, size and location of fire stations to serve the project. Fire protection services for the net SAP and PRSP areas are provided by Placer County Fire. Placer County has a full-service contract with the California Department of Forestry and Fire Protection to provide fire protection services, including but not limited to structural and wildland fire protection, dispatch services, fire inspections, basic and advanced life support emergency medical services. Placer County Fire also has mutual aid agreements with other jurisdictions and entities including the City of Roseville, and through these agreements, the Placer County Fire Department would be able to receive assistance if needed. The City of Roseville has entered into the Western Placer County Cooperative Fire Services Response Agreement Operational Plan along with other local fire departments and fire districts. This operational plan is designed to provide personnel from each agency a means for executing the Western Placer County Cooperative Fire Service Response Agreement. In addition, this plan outlines procedures and guidelines for the signatory agencies in delivering efficient initial response regardless of jurisdictional boundaries.

Placer County Fire Station 77 is located on Athens Avenue in the SAP area. This station provides first-level fire and emergency response for the project area and is staff with Advanced Life Support

municipal fire protection delivery models. Chapter 3 of the Draft EIR, “Project Description,” notes that a new fire station is required to be included in the PRSP area to accommodate increased demand for fire protection services. The timing and triggers for the fire station in the PRSP area and 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. The PRSP notes on page 8-10, if it is determined that an on-site fire station is needed to serve the PRSP area, one can be accommodated on CP parcel PR-71 or on any parcel with a General Commercial, Commercial Mixed Use, or Campus Park land use designation. Mitigation Measure 4-13-1b requires that the specific locations for the fire stations and fire station design be identified and coordinated with the Placer County Fire Department. The fire stations would be constructed as needed to serve development and maintain staffing ratios.

The PRSP area is located entirely within the future annexation area of Placer County’s Community Facilities District 2012-1 to fund maintenance and operation of fire and emergency services within SAP. Mitigation Measure 4-13-1a requires the creation of a Community Facilities District, County Service Area Zone or Benefit or annexing into an existing CSA Zone of Benefit or combination thereof for the purposes of funding supplemental revenue for operations, training, maintenance and personnel costs to provide fire protection and emergency response services.

The net SAP area is located within the Placer County Fire Facilities Fee area, and the PRSP area would annex into the fee program to provide a funding mechanism for the construction of fire and emergency service facilities. See response to comment 4-5 regarding timing and performance standards.

4-52 The comment raises a number of issues related to law enforcement impacts and expresses concern that the direct connection between the project area and the City of Roseville would create the impression that law enforcement services would be provided by the City of Roseville. Specific concerns include increased 911 emergency calls routed to the City of Roseville, the need for additional California Department of Highway Patrol (CHP) services, law enforcement staffing, and emergency response times. Responses are provided below for each of these issues.

- ▲ 911 calls. As stated in the Draft EIR (page 4.13-20), the police-to-population ratio established by the Placer County General Plan is 1.0 officer per 1,000 population for unincorporated areas. However, for new growth areas, the sheriff’s department utilizes a standard of 1.2 officers per 1,000 population as a threshold to determine adequate service. In addition, the Draft EIR analysis assumes maintenance of the current response time: approximately 8 minutes or less for an emergency call. Placer County uses these service standards to determine the additional law enforcement staff and facilities necessary to serve a proposed project. This would include staff and facilities necessary for response to 911 calls within the project area. To determine significant impacts associated with police protection service, the Draft EIR (4.13-19) uses a threshold of significance based on whether the project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services. The increase in demand for police protection would not result in the need to construct expanded or additional stations, such that a substantial adverse effect would result (that has not already been evaluated in this or other EIR). Therefore, no addition analysis is needed.
- ▲ CHP demand. The Draft EIR states (page 4.13-28) that although implementing the SAP would increase the number of vehicles on SR 65, the SAP does not propose changes to SR 65 that would increase the service area for the CHP. State service providers, such as CHP, are funded in part by property taxes. Development of the net SAP area would increase property taxes paid to the State of California that could fund an increase in CHP staffing levels. Implementing the SAP would not be anticipated to increase demand for CHP services such that expansion of CHP

offices would be required. Although the commenter suggests that increased traffic associated with the project would result in increased response from Roseville Police Department and Roseville Fire Department for collisions within the city, the comment does not draw a nexus between that increased response and the need for increased demand for CHP. The Draft EIR appropriately evaluates impacts to law enforcement services, including CHP. See discussion above regarding the threshold of significance for police protection services. No revisions are necessary.

- ▲ Police staffing. The comment suggests that the Draft EIR indicates that 19 new officers would be required to meet the law enforcement officer-to-population ratio. Using an officer-to-population ratio of 1:1,000, the commenter indicates that, for a project introducing 24,000 new residents, the actual number should be 24 new officers. There are several incorrect statements made in this comment. The Draft EIR (page 4.12-10) indicates that the project would generate 19,314 new residents (not 24,000). It states that the County's officer-to-population ratio is 1:1,000; however, as described above, for new growth areas a standard of 1.2:1,000 is used (Draft EIR page 4.13-20). Using the appropriate service ratio, the Draft EIR (page 4.13-28) identifies the need for 23.2 new officers to support the project (not 19). This is close to the 24 new officers suggested by the comment. Also, as described in the Draft EIR, the Sac State–Placer Center would provide its own law enforcement. The fact that Sac State–Placer Center students may live outside the project area (including within the city) is not different than any other proposed land use which involves employees or visitors that would use a component of a project and live elsewhere. Those services would be paid for via property taxes or other taxes/fees associated with the place of residence. General impacts associated with population growth are evaluated in Section 4.12 of the Draft EIR, "Population, Employment, and Housing," and also in the "Growth Inducement" discussion in Chapter 5, "Other CEQA-Mandated Sections." See response to comment 4-5 for a discussion of mitigation timing. No revision to the Draft EIR is necessary.
- ▲ Response times. The comment suggests that the project would result in law enforcement staffing below County standards and that response times would not be maintained. As discussed above, the comment did not correctly interpret the Draft EIR's analysis of law enforcement service ratios. Regarding response times, the Draft EIR states (page 4.13-28) that the Placer County Sheriff's Office currently has sufficient staff to meet existing law enforcement services and currently meets County response time goals (Barnhart, pers. comm., 2017). The Draft EIR further states (page 4.13-28) that as development is constructed, the Placer County Sheriff's Office anticipates redrawing the boundaries for the beats that serve the net SAP area to add more officers and maintain the response time standards for emergency calls (Barnhart, pers. comm., 2017). See discussion above regarding the threshold of significance for police protection services. No revisions to the Draft EIR are necessary.

- 4-53 The comment expresses concern that project development would increase demand on the City of Roseville's Martha Riley Community Library. This comment is based on the significant number of cardholders who live outside of Roseville. The comment concludes with concern that the lack of commitment from the future university to make its library open to the public and no funding for a library within the project area must be addressed. Comments indicate City of Roseville desires funding for its library system. Page 4.13-18 of the Draft EIR notes that the County requires the collection of Capital Facilities Fee to mitigate impacts caused by new development in the county. The fee revenue is used to maintain per-capita facility standards for facilities such as libraries. Facilities to be funded under the fee program include expansion and construction of libraries. The SAP, including the PRSP, is required to pay this fee to mitigate impacts caused by new development. The Draft EIR (page 4.13-21) identifies SAP Policies PFS 2.2 through 2.4, which provide the direction to collect both capital and operational funding from new development to offset impacts to public services. Also, Mitigation Measure 4.13-4 requires the creation or annexation of development into a Community Facilities District, County Service Area Zone of Benefit, or annexation into an existing zone of benefit for the purpose of funding supplemental revenue for library facilities. Note that the

County has revised Mitigation Measure 4.13-4 to require additional interim library service. See Chapter 2, “Revisions to the Draft EIR,” for the revised mitigation measure text.

- 4-54 The comment expresses concern about Impact 4.13-5 of the Draft EIR. Specific concerns include parkland credit for privately-owned land, residential units in the SAP area, insufficient little league fields and soccer fields, and Roseville parks that were not listed in the Draft EIR. Table 4.13-9 in the Draft EIR summarizes the parks and open space requirements for net SAP area. Requirements are based on an estimated population of 6,095 residents in the net SAP area. As noted on page 4.13-36, “Because the net SAP area has sufficient space and opportunity to comply with Placer County General Plan and SAP policies for provision of sufficient active and passive parkland and would be required to do so, impacts to parks and recreation would be less than significant.” Also, the net SAP area has been analyzed at a programmatic level and does not include evaluation of specific recreation facilities such as sports fields. Development projects proposed within the net SAP area are evaluated against General Plan and SAP policies at time of submittal of an application. When the application is submitted in the net SAP area, the proposal would be required to comply with the General Plan and SAP requirements for parkland provision, including provision of specific recreation facilities, such as sports fields. For the PRSP, Table 4.13-10 on page 4.13-36 of the Draft EIR summarizes parks and open space requirements and credits for the PRSP. The PRSP would provide a total of 69.77 active acres of parks. Included within the 69.77 is 7.23 acres of land provided for private recreation facilities. These private recreation areas are given a 50-percent credit in meeting the County’s active parkland requirements. The total amount of credited acreage is 66.10 acres which meets the County’s General Plan standards.

The Draft EIR includes evaluation of impacts associated with regional parks. As stated on page 4.13-38 of the Draft EIR, future development in the net SAP and PRSP areas would pay in-lieu fees, dedicate parkland, and/or construct parks and recreation facilities in compliance with Placer County requirements and to meet the future SAP demand for parks and recreation facilities. Additionally, park facilities could be constructed in the project area to meet the needs of residential development in the net SAP and PRSP areas, or appropriate in-lieu fees would be paid if on-site recreation requirements are infeasible. In-lieu fees would include fair-share contribution to development of regional parks in the area. No revisions to the Draft EIR are necessary.

- 4-55 The comment suggests that the Draft EIR must address cumulative impacts to City of Roseville parks. The Draft EIR evaluates cumulative impacts on parks and recreation facilities. Specifically, Cumulative Impact 4.13-13 evaluates the project’s potential contribution to cumulative impacts on parks and recreation facilities (including regional park facilities) along with other proposed and approved development in the area. Cumulative Impact 4.13-13 concludes that because the County’s active and passive park standards would be met by future development in the project area through construction of park facilities, payment of in-lieu fees, contribution to regional recreation facilities, and dedication of land for parks, implementing the project would not result in a considerable contribution to a cumulative impact on parks and recreation facilities.
- 4-56 See response to comment 4-4 regarding the extension of Foothills Boulevard.
- 4-57 The comment expresses concern regarding the inclusion of major roadway projects included in the cumulative traffic analysis and suggests the development of a phasing plan to identify the timing of roadway improvements. The cumulative traffic analysis includes transportation improvements that are documented in the financially constrained project list of SACOG’s 2036 MTP/SCS. Therefore, these transportation improvements are considered reasonably foreseeable. The commenter’s request for a phasing plan is noted.
- 4-58 The comment expresses concern about including roadways connecting Fiddymont Road to Blue Oaks Boulevard, and Woodcreek Oaks Boulevard to Blue Oaks Boulevard through residential neighborhoods via Crocker Ranch Road and Parkside Way in the traffic model. The comment suggests that these roadways should be removed from the model because they are minor roadways

traveling through residential areas. Crocker Ranch Road represents the shortest route between Fiddymment Road north of Angus Road and Blue Oaks Boulevard east of Crocker Ranch Road. Despite its lower speed, it is a shorter travel time route than remaining on Blue Oaks Boulevard and Fiddymment Road to travel between the same end points, as demonstrated by Google Maps and GPS navigation. The links representing Crocker Ranch Road and Angus Road are also included in the City of Roseville's traffic forecasting model and have been included in the traffic forecasting models for the Amoruso Ranch Specific Plan EIR, the Campus Oaks traffic study, and other recent traffic analyses for the City of Roseville to reflect their function as residential collector streets. It is the function of the traffic forecasting model to recognize that Crocker Ranch Road is the shortest route for trips between these two arterial roadways. There are no physical barriers that prevent vehicles from using Crocker Ranch Road as a route between Fiddymment Road and Blue Oaks Boulevard. Therefore, the traffic forecasting model is accurate in showing both existing and forecasted future trips using it as a likely route between these two arterial roadways.

Similarly, Parkside Way and Northpark Drive are also included in the City of Roseville's traffic forecasting model and have been included in the traffic forecasting models for the Amoruso Ranch Specific Plan EIR, the Campus Oaks traffic study, and other recent traffic analyses for the City of Roseville. Although these are local roadways, they along with Opal Drive and Diamond Creek Boulevard have been included in the City of Roseville traffic forecasting model because they function as residential collector streets that collect trips from the residential neighborhoods near Diamond Creek Elementary School and deliver them to arterial roadways, such as Woodcreek Oaks Boulevard, Fiddymment Road, and Blue Oaks Boulevard.

Because these roadways are local residential collectors, the traffic forecasting model codes them accordingly with lower speeds and capacity, generally making them less attractive than higher speed and higher capacity arterial roadways. However, the traffic forecasting model predicts that the addition of project trips to Woodcreek Oaks Boulevard results in substantially over capacity conditions on Woodcreek Oaks Boulevard across the existing two-lane bridge between Tradewinds Drive and Deschutes Drive. Therefore, the forecasting model predicts that some trips would divert to Parkside Way to access Blue Oaks Boulevard, which some trips are likely to use to avoid the overly congested condition on Woodcreek Oaks Boulevard. It is this traffic condition that triggers the need for the Foothills Boulevard extension, as described in Mitigation Measure 4.14-1b.

Therefore, because these roadways serve as collector roadways and have been included in multiple previous traffic analyses for the City of Roseville, they are also appropriate to include in this traffic analysis. They also more accurately forecast the actual routes trips would use when considering travel times between trip origins and destinations and anticipated congestion on major arterial roadways.

- 4-59 The comment expresses disagreement with the inclusion of certain transportation improvements in the cumulative traffic analyses presented on pages 4.14-94 and 4.14-95 of the Draft EIR. The cumulative traffic analysis includes transportation improvements that are documented in the financially constrained project list of SACOG's 2036 MTP/SCS. Therefore, the County has determined that these transportation projects are reasonably foreseeable. This includes full buildout of the I-80/SR 65 interchange improvements and Placer Parkway Phase 2.

Placer Parkway would be constructed through the PRSP and net SAP areas. Because development in the PRSP and SAP areas would contribute funding to Placer Parkway via the SPRTA fee, the County asserts that Placer Parkway would not have sufficient funding without development of the net SAP and PRSP areas. The cumulative plus project traffic analysis includes Placer Parkway Phase 2 based on future development levels included in this cumulative scenario, and its inclusion in the SACOG 2036 MTP/SCS financially constrained project list.

The widening of Riego Road is based on forecasted development of Sutter Pointe, which is included in the travel forecasting model and reflected in SACOG's 2036 regional projections.

The extension of Blue Oaks Boulevard to Santucci Boulevard is included in the City of Roseville's traffic forecasting model and has been included in the traffic forecasting models for the Amoroso Ranch Specific Plan EIR, the Campus Oaks traffic study, and other recent traffic analyses for the City of Roseville. It is also consistent with buildout of the Roseville General Plan. Therefore, this analysis includes this extension to be consistent with previous traffic analyses completed for the City of Roseville.

- 4-60 The comment expresses concern with the proposed LOS policy (Policy TM-1.2) in the proposed SAP. The comment also identifies potential inconsistencies in the width and number of lanes on two major roadways (Sunset Boulevard and Campus Park Boulevard) that connect the PRSP area to the City of Roseville's Amoroso Ranch Specific Plan (ARSP) and suggests that these roadways be widened to four lanes to be consistent with the ARSP and reduce demand on Fiddymont Road and Woodcreek Oaks Boulevard. The travel forecasting model used for the Draft EIR analysis included the development of the ARSP and showed that the two lanes proposed for Sunset Boulevard and Campus Park Boulevard are sufficient to serve the forecasted cumulative plus project traffic volumes. Even if these roadways were widened to four lanes, the travel forecasting model showed that traffic demand on Fiddymont Road and Woodcreek Oaks Boulevard would not noticeably change since the roadways already have excess capacity as two-lane roadways. Therefore, it is appropriate for these roadways to remain two lanes as proposed in the PRSP.

Placer County will work with the City of Roseville to ensure an appropriate transition from the proposed roadway cross-sections in the PRSP area to the proposed roadway cross-sections in the ARSP.

- 4-61 The comment notes that several City of Roseville intersections analyzed as unsignalized intersections were recently (or soon will be) signalized (i.e., between 2018 and 2019). The traffic analysis considers traffic conditions at the time the notice of preparation (NOP) was released in November 2016. At that time, the intersections identified in the comment were not signalized, and therefore are analyzed as stop-controlled intersections. Table 4.14-24 of the Draft EIR shows that the Woodcreek Oaks Boulevard/Crimson Ridge Drive intersection operates at an acceptable LOS with side-street stop-control; therefore, it would operate at an acceptable LOS C or better as a signalized intersection. As noted in Impact 4.14-4, the study acknowledges that signalization of Woodcreek Oaks Boulevard/Painted Desert Drive restores operations to an acceptable LOS.

Mitigation Measure 4.14-4 shows that the proposed project would be responsible for paying impact fees that constitute a fair-share contribution toward the signalization of the Woodcreek Oaks Boulevard/Northpark Drive and Woodcreek Oaks Boulevard/Parkside Drive intersections, as described in the comment.

The signalization of these intersections would increase the percentage of signalized intersections operating at LOS C or better.

- 4-62 The comment notes that a few of the LOS exceptions identified in Placer County's Dry Creek/West Placer Community Plan were recently annexed into the City of Roseville and should be analyzed using the City of Roseville's LOS policy/standards. Page 16 of Appendix M: Sunset Area Plan and Placer Ranch Specific Plan Transportation Impact Study clarifies that the Baseline Road/Walerga Road/Fiddymont Road and Baseline Road/Watt Avenue intersections are now under the City of Roseville's jurisdiction; and therefore, the traffic impacts at these intersections are based on the City of Roseville's significance criteria (i.e., City of Roseville level of service policy/standards). The comment also identifies Baseline Road – Sutter County Line to Walerga Road/Fiddymont Road. The segment east of Watt Avenue is within the City of Roseville and therefore the operations along this segment are not analyzed according to County standards. The segment west of Watt Avenue remains in the unincorporated County and is evaluated using County standards.

- 4-63 The comment notes that the City of Roseville General Plan LOS Policy incorrectly omitted a reference to the a.m. peak hour. To correct this omission, Level of Service Policy 1 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.
- 4-64 The comment notes that the City’s LOS policy applies to both roadway segments and intersections; and that the City relies on its intersection LOS criteria to determine roadway width needs. The comment expresses concern that roadway segment impacts are not identified in the Draft EIR. Consistent with this comment, the Draft EIR analyzes traffic impacts to City of Roseville facilities based on the City’s intersection LOS criteria. These criteria and methodology are consistent with the City of Roseville’s previously adopted environmental documents, which similarly do not quantitatively analyze roadway segment operations for City of Roseville roadways. However, pages 75-76, 110-112, 180-181, and 220-221 of the Transportation Impact Study (Appendix M of the Draft EIR) describe the project’s effect on key roadway segments in the City of Roseville. Based on these effects, the Transportation Impact Study identifies potential roadway widening projects that may be considered to serve the traffic increases generated by the proposed project.
- 4-65 The comment notes that Impact 4.14-4 in the Draft EIR states that signal warrants are met until the Foothill Boulevard extension is completed, and requests that a signal be installed at Woodcreek Oaks Boulevard/Parkside Way and Woodcreek Oaks Boulevard/Northpark Drive intersections to address near-term impacts. Impact 4.14-4 in the Draft EIR discloses the project impacts to traffic conditions at the Woodcreek Oaks Boulevard/Northpark Drive and Woodcreek Oaks Boulevard/Parkside Way intersections, as described in the comment. Mitigation Measure 4.14-4 commits project proponents to pay impact fees that constitute the project’s fair-share contribution toward the installation of traffic signals at these intersections.
- 4-66 The comment notes that the proposed SAP does not mention Intelligent Transportation Technology/Systems (ITS) within its goals and policies outside of Policy TM-1.11 and suggests that ITS technology be incorporated into the transportation plan. The County will consider ITS in the implementation of the transportation network. This comment raises policy considerations and does not identify issues related to the EIR’s analysis or adequacy.
- 4-67 The comment suggests that the County work with adjoining agencies when updating the commercial truck routes (STAA) to ensure adequate routes are provided to the local freeway system. The County will coordinate with adjoining agencies where commercial truck routes (STAA) cross from the county into adjoining local jurisdictions.
- 4-68 The comment inaccurately states that Exhibit 4.14-9 in the Draft EIR only shows an increase of 40 new trips on Fiddymment Road between Pleasant Grove Boulevard and Blue Oaks Boulevard. The comment also inaccurately asserts that page 4.14-49 of the Draft EIR states this segment of Fiddymment Road would operate at LOS D, E, or F. Exhibit 4.14-9 shows that Fiddymment Road between Pleasant Grove Boulevard and Blue Oaks Boulevard is forecasted to experience an increase of over 30,000 daily trips. Similarly, page 4.14-49 of the Draft EIR refers to the segment of Fiddymment Road north of the Roseville city limits (and over a mile north of the segment between Pleasant Grove Boulevard and Blue Oaks Boulevard) when identifying roadway segments that would operate at LOS D, E, or F.
- 4-69 The comment expresses concern that the timeline identified for Phase 1 of Placer Parkway on page 4.14-50 of the Draft EIR is unrealistic. The comment inaccurately states that construction design

documents have not been started to support this claim. The comment also requests that language be added which requires Phase 1 of Placer Parkway be completed before issuing residential building permits for development beyond 25 percent of the PRSP area. Page 4.14-50 of the Draft EIR discloses that the project would have a significant and unavoidable impact in the short-term if more than 25 percent of the PRSP area is developed and Phase I of Placer Parkway is not yet completed and open to traffic. The Draft EIR acknowledges and discloses this impact and also recognizes that this impact would be reduced to less than significant upon completion of Phase I of Placer Parkway, regardless of whether this occurs in 2022 or shortly thereafter. This significant short-term impact does not preclude the County from proceeding with development in the PRSP area. The County is proceeding in the construction design phase of Phase 1 Placer Parkway and anticipates 90 percent construction plans will be completed in fall 2019.

- 4-70 The comment notes that the Draft EIR states there is a timing gap between when significant impacts to City of Roseville facilities occur and when funds for mitigation will be available. The comment also requests that other feasible mitigation be identified to reduce the impact at the time it occurs. Page 4.14-51 of the Draft EIR acknowledges and discloses that this impact is significant and unavoidable in the short-term until the Foothills Boulevard extension is constructed. The Draft EIR also recognizes that this impact would be reduced to less than significant once the Foothills Boulevard extension is constructed. This significant short-term impact does not preclude the County from proceeding with development in the PRSP area. Additional mitigation beyond what is already identified in the Draft EIR would have a short-term use and become obsolete once Foothills Boulevard is extended. Therefore, additional mitigation is not prudent.
- 4-71 The comment notes that the Draft EIR does not discuss whether a traffic signal at the Watt Avenue/PFE Road intersection is within the Sacramento County capital improvement program (CIP). This comment inaccurately conveys that the Watt Avenue/PFE Road intersection is in Sacramento County. The Watt Avenue/PFE Road intersection is within Placer County and is included in the Dry Creek Benefit District of the Placer County Countywide CIP, as described on page 4.14-55. The County is collecting traffic impact fees from development in the Dry Creek Benefit District, which will ultimately fund the signalization of this intersection.
- 4-72 See response to comment 4-3 regarding the percentage of signalized intersections operating at LOS C or better and improvements not identified in the City's CIP.

The comment notes that the SAP includes an LOS policy establishing LOS E as the standard within the SAP and asserts that this is in conflict with the City/County memorandum of understanding (MOU). However, the City/County MOU does not apply to the SAP area.

The comment also expresses concern that the project would accelerate the timing of improvements that are identified in Mitigation Measure 4.14-3 and within the City's CIP. The fair share funding process described in Mitigation Measure 4.14-3 would supplement the City impact fees used to fund improvements within the City's CIP, assuming a fair and reasonable arrangement is reached between the County and City. This additional funding would allow improvements to proceed sooner than if these improvements were solely reliant on City impact fees, and would address the timing issues raised by the comment.

Subsection (a) of comment 4-72 incorrectly infers that the net SAP and PRSP areas are included within the boundaries of an MOU between the City of Roseville and Placer County and that Exhibit C, Roadway LOS development standards described in that MOU are applicable to the net SAP and PRSP areas. The net SAP and PRSP areas are both outside of the boundaries that the MOU covers.

See response to comment 4-22 regarding signal timing optimization. The Draft EIR mitigation analysis considered the additional delay added to lower volume movements and found that the signal timing adjustments result in an overall net benefit to traffic operations at intersections where signal timing optimization is listed as a mitigation measure. This includes their effect on signal



coordination along major corridors, including the Blue Oaks Boulevard, Douglas Boulevard, Pleasant Grove Boulevard, and Roseville Parkway corridors listed in the comment.

The comment expresses concern regarding Mitigation Measure 4.14-3 regarding adding right-turn overlap phases and prohibiting U-turn movements. As described in Impact 4.14-17 of the Draft EIR, the cumulative plus project traffic analysis shows that U-turn prohibitions at most City of Roseville intersections would not be necessary when reasonably foreseeable regional roadway improvements are considered, including the four intersections listed in the comment. The traffic generated by the proposed project would occur over an extended period of time, and the 20-year land use development totals that are included in the EIR's cumulative plus project analysis would occur together with these regional roadway improvements.

The comment also expresses opposition to additional intersection widening at several locations. As described in Mitigation Measure 4.14-17 of the Draft EIR, the additional intersection widening at the three intersections listed in the comment would not be necessary when reasonably foreseeable regional roadway improvements are considered, as shown in the cumulative plus project traffic analysis.

- 4-73 See response to comment 4-3 regarding fair-share funding for improvements at City of Roseville locations.

The comment expresses concern that Mitigation Measures 4.14-3 and 4.14-4 do not commit the County to specific actions, contain extraneous information regarding a possible formation of a JPA and reciprocity, and do not specify that funds would be held in trust for the City of Roseville for the expressed purpose of improving the specified facilities within the City. In response to this comment, Mitigation Measures 4.14-3 and 4.14-4 on pages 4.14-64 and 4.14-71, respectively, of the Draft EIR are 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.

- 4-74 The comment requests that various figures in the SAP be updated to show the Foothills Boulevard extension. As an area plan, the SAP does not identify specific off-site improvements on the figures. No changes to the SAP are necessary.

The comment requests that Exhibit 3-5 of the Draft EIR should be revised to show the Foothills Boulevard extension. However, Exhibit 3-5 shows the SAP land use diagram and for the same reasons described above does not show specific off-site improvements. Off-site improvements are shown in Exhibit 3-24. Also, the comment indicates that the Foothills Boulevard extension is shown in Exhibit 3-24, but not described in the Draft EIR. The Draft EIR includes a description of the Foothills Boulevard extension of page 3-21 and page 3-72.

The comment indicates that Exhibits 4.14-6 and 4.14-7 show the Foothills Boulevard extension as a four-lane roadway instead of the six-lane roadway described in the Draft EIR. Both Exhibit 4.14-6 and 4.14-7 show Foothills Boulevard as a six-lane roadway in the PRSP area and does not show the number of lanes for the off-site extension but shows the extension as a “Future Roadway.” The Draft EIR is not internally inconsistent.

Finally, the comment states that figures in the Traffic Impact Study are inconsistent. Fehr & Peers reviewed the figures in the Traffic Impact Study and verified that they are accurate.

- 4-75 The comment expresses concern that project residents may rely on City of Roseville Transit services, and that the Draft EIR does not evaluate potential impacts to City of Roseville Transit. The project’s transit impacts are disclosed in Impact 4.14-13 of the Draft EIR, which acknowledges that the increase in population, employment, students, and attractions would result in an increased demand for transit use. The Draft EIR describes the existing transit service and acknowledges that Roseville Transit provides limited service to the SAP area on page 4.14-22 of the Draft EIR. Therefore, Mitigation Measure 4.14-13a establishes that Roseville Transit will be consulted when the County prepares a transit master plan for the SAP area. Mitigation Measures 4.14-13a and 4.14-13b in the Draft EIR commit Placer County to adequately plan for and fund transit services for the net SAP and PRSP areas. As a member of the Placer County Transportation Planning Agency, the City will be able to participate in the Long Range Transit Master Plan effort referred to in Policy TM-3.1.

The project and this analysis do not commit Roseville Transit to expand service into the net SAP and PRSP areas. Existing ridership numbers show plenty of available capacity on Roseville Transit’s fixed route bus lines. Should Roseville Transit decide to expand service into the SAP area, including the PRSP area, the system’s available capacity combined with the transit master plan would ensure that the project would not impact Roseville Transit service.

- 4-76 The comments suggest that the project would reduce the lifespan of the WRSL and that the Draft EIR did not examine impacts on the MRF. The comment recommends mitigation requiring the project to pay its fair share for landfill expansion. Finally, the comment states that the Draft EIR did not examine the full buildout of the SAP on solid waste disposal. This is incorrect. The Draft EIR includes Impact 4.15-6, which evaluates potential impacts from increased demand for solid waste associated with “buildout of the net SAP area and PRSP area. Impact 4.15-6 concludes (page 4.15-57) that:

after the recycling and diversion requirements for construction waste in the net SAP area and PRSP area are met, a total of 192,695 cubic yards of construction waste would remain, which would be 0.8 percent of the remaining capacity at WRSL. Combined, operation of new uses in the net SAP and PRSP areas would generate 201 tons of solid waste on a daily basis, which would be 36 percent of the available daily permitted processing capacity at the MRF. Annually, buildout of the net SAP area and PRSP area would result in the disposal of an estimated 49,004 cubic yards, which would be 0.2 percent of the remaining capacity at WRSL. Because implementation of the SAP and PRSP would comply with all regulatory requirements that relate to the disposal and recycling of solid waste and because the MRF and WRSL have adequate capacity for disposal of solid waste generated by construction and operation of the SAP and PRSP, this impact would be less than significant.

The commenter provides no evidence that consumption of 0.8 percent of the remaining capacity at WRSL would substantially reduce the lifespan of the landfill. Furthermore, the Draft EIR evaluates

cumulative impacts related to the WRSL and MRF. See Cumulative Impact 4.15-17: Cumulative increase in demand for solid waste services (Draft EIR, page 4.15-69). No revisions to the Draft EIR are necessary.

- 4-77 The comment suggests that the Draft EIR should be revised to discuss the need for a wastewater metering facility, its location, and impacts. At the time of preparation of the Draft EIR, the need and location for wastewater metering facilities was not known and will not be known until further along in the design process. To include such information at this time would be speculative. The Placer Ranch Sewer System Master Plan (included as Appendix H of the Draft EIR) details the flow meter requirements. Page 37 of the Sewer System Master Plan states:

In order for the City to account for contributing flows to the treatment plant, flow meters shall be installed at the Placer County/City of Roseville boundary line where the sewer pipe crosses from County to City jurisdiction. There is currently an existing flow meter, known as the Cincinnati meter, located at the southern limit of Cincinnati Avenue. A proposed flow meter shall be located on the Fiddymont Road sewer main to measure flows from PRSP and the SA which are from the County. The City of Roseville will assist with locating the proposed flow meter, along the pipeline alignment.

- 4-78 The comment suggests that the Draft EIR should be revised to discuss the need for a recycled water metering facility, its location, and impacts. See response to comment 4-77. As described in Chapter 2, "Revisions to the Draft EIR," the May 2017 Placer Ranch Recycled Water Master Plan was included as Appendix G to the Draft EIR; however, a more recent July 2017 version of the document should have been included instead of the May version. The July 2017 Placer Ranch Recycled Water Master Plan, which is included as Appendix B of this Final EIR, states (p. 13) "[t]he transmission pipeline will be designed to fill the tank during either peak or off-peak hours through a [pressure release valve] and metering station located at the Roseville city limit. It should be noted that impacts associated with the metering station are consistent with the overall impacts evaluated for the utilities infrastructure and other development associated with the PRSP and this additional specificity does not change the impacts or conclusions of the Draft EIR.
- 4-79 The comment suggests that the two 12-inch water mains that would extend from the City of Roseville boundary and connect to proposed 42-inch and 24-inch water mains within the PRSP area be revised to be 24-inch lines. As outlined in the Placer Ranch Potable Water Master Plan, the location of the 12-inch water mains provides the appropriate system looping for reliability. The planned area's maximum day demand is approximately 3 mgd, which can be obtained via two 12-inch mains or a single 18-inch main. As designed, these lines can be extended into the City of Roseville to enhance water system reliability in this area of the City. In addition, a 42-inch regional-serving water line would also be extended into the City of Roseville via the Placer Parkway corridor, consistent with Placer County Water Agency's (PCWA's) master plan. The City of Roseville would have the opportunity to tie into this line from the 24-inch line planned in future Westbrook Boulevard, which provides a viable solution for the City of Roseville to enhance its water infrastructure reliability without requiring 24-inch water lines to be extended from the PRSP area as requested.
- 4-80 The comments requests that text be added to the recycled water discussion on page 4.15-8 of the Draft EIR. The Draft EIR is revised, but not page 4.15-8, as requested by the commenter. In response to this comment 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.

- 4-81 The comment requests that text be added to the recycled water discussion on page 4.15-8 of the Draft EIR. The revised text is added to page 3-26 of the Draft EIR as shown in response to comment 4-80, above.
- 4-82 The comment states that the Draft EIR must explicitly state whether the demand for recycled water is within or exceeds the estimated peak day demand considered in the Systems Evaluation. Recycled water is evaluated in the Draft EIR as a component of Impact 4.15-1, which evaluates potential impacts related to water supply. The Placer Ranch Specific Plan Recycled Water Master Plan, included as Appendix G of the Draft EIR, provides additional detail regarding recycled water and states (page 17) that since recycled water is being supplied by the wholesaler during off-peak periods, existing City of Roseville peak hour recycled water demands should not be affected but that additional coordination with the City of Roseville as well as the execution of a recycled water operations agreement per the Amended and Restated Agreement Regarding the Operation and Use of the South Placer Regional Wastewater Facilities dated October 1, 2012, would be required. Additionally, on-site recycled water storage would be 120 percent of one max day of demands; therefore, it is expected that recycled water would be available from the wholesaler. It should also be noted that the Draft EIR (page 4.15-8) identifies the City of Lincoln as another option for providing recycled water.
- 4-83 The comment requests a minor clarification to the text in the first paragraph on page 4.15-9 of the Draft EIR regarding SPWA. Consistent with the requested text change, 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).

- 4-84 The comment requests that the text on page 4.15-12 be revised to disclose that the SPWA service boundary would be adjusted to include the entire PRSP and net SAP areas. Page 4.15-12 of the Draft EIR is part of the "Environmental Setting" discussion, which describes the existing physical

conditions of the project site and surroundings. Adding text that does not relate to the existing physical conditions would not be appropriate in this part of the Draft EIR section. The Draft EIR includes Mitigation Measure 4.15-4a, which requires annexation to SPWA's regional service area and PGWWTP's service area. This addresses the concern raised in the comment; therefore, the Draft EIR requires no revision. However, in response to this comment, it should be noted that 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.

- 4-85 The comment suggests a minor clarification to the text on page 4.15-25 of the Draft EIR. Consistent with the requested text change, 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.

- 4-86 The comment notes an inconsistency between peak wet weather flows (PWWF) identified on pages 4.15-43 and 4.15-45. The Draft EIR (page 4.15-43) reports two different PWWF estimates, but they are not inconsistent. The estimated 11.76 mgd PWWF is the total PWWF resulting from buildout of the net SAP area. The estimated 8.49 mgd PWWF is the amount of flow expected to be conveyed through the PRSP wastewater conveyance system (as opposed to other points of connection). See Table 5 in Draft EIR Appendix B, Sunset Area Water, Wastewater, and Recycled Water Technical Report.
- 4-87 The comment suggests that the upsizing of a 24-inch to 27-inch sewer line (discussed on page 4.15-46 of the Draft EIR) needs to be added as a mitigation measure. Chapter 3 of the Draft EIR, "Project Description," specifically identifies the potential need to upsize "one 24-inch sewer line to a 27-inch sewer line where two existing 24-inch lines cross under Pleasant Grove Creek" (Draft EIR, page 3-71). Therefore, no changes to the Draft EIR are necessary.
- 4-88 The comment suggests that the analysis of Impact 4.15-4 be revised to evaluate project flows in addition to buildout flows, not current flows, at the PGWWTP to ensure capacity. In addition to Impact 4.15-4, the Draft EIR includes Cumulative Impact 4.15-15, which evaluates the project's contribution to cumulative increase in demand for wastewater treatment services, including wastewater demand associated with cumulative development projects. See Table 4.15-14 of the Draft EIR, which summarizes the buildout average dry weather flows for the SPWA service boundaries. The Draft EIR requires no revision in response to this comment.

- 4-89 The comment notes a discrepancy between the flows for the PRSP and SAP areas indicated in Impact 4.15-4 of the Draft EIR and the flows shown on page 19 of Appendix H of the Draft EIR. Appendix H does not include the most recent calculations used in the Draft EIR analysis. The Draft EIR states (p. 4.15-1) several technical memoranda [included as Appendix P of the Draft EIR] were prepared to update the utilities calculations in response to the revised PRSP, including updates to the Potable Water, Recycled Water, and Water Conservation Master Plans; the Sanitary Sewer Master Plan; the Storm Drain Master Plan; and the Dry Utilities Master Plan. The revised calculations in these technical memoranda reflect the revised land use plan and are incorporated into this section of the Draft EIR. The calculations included in Appendix P of the Draft EIR are consistent with the calculations used in the Draft EIR analysis.
- 4-90 The comment notes a discrepancy between the ADWF for the SAP shown in Table 4.15-10 of the Draft EIR and the ADWF shown in Appendix H of the Draft EIR. This is the same issue identified in comment 4-89. See response to comment 4-89.
- 4-91 The comment requests changes to text in Appendix G of the Draft EIR to show that recycled water would be provided through the line in Woodcreek Oaks Boulevard, not the North Zone Pump Station. As the appendix is a technical document prepared for the project, it represents preliminary designs and plans that may change prior to construction. No revisions to the technical studies are necessary.
- 4-92 The comment requests a change in the text of Section 4.3 in Appendix G of the Draft EIR. As this appendix is a technical document prepared for the project, it represents preliminary designs and plans that may change prior to construction. No revisions to the technical studies are necessary.
- 4-93 The comment requests removal of reference to the North Zone Pump Station in Appendix H of the Draft EIR. As this appendix is a technical document prepared for the project, it represents preliminary designs and plans that may change prior to construction. No revisions to the technical studies are necessary.
- 4-94 The comment notes a discrepancy in the ADWF for the PRSP area between page 19 of Appendix H and page 3 of the SSMP. The two studies identified by the commenter were prepared for two different plans by two different technical experts. This difference, which is less than 0.2 mgd, between two different plans does not represent a substantial discrepancy. In addition, the estimated “2.17 mgd” identified by the commenter was further refined in the Draft EIR, which states (page 4.15-66), “the Systems Evaluation estimated flows from PRSP area development to be 2.17 mgd ADWF (RMC Water and Environment 2009:3-5 and 3-6). Development in the PRSP area is anticipated to generate an estimated 1.99 mgd ADWF, which is lower than the wastewater flows anticipated by the Systems Evaluation. Presumably, PWWF from PRSP area development would also be lower than assessed in the Systems Evaluation.” Therefore, this minor difference between a specific value as reported in two Draft EIR appendices does not affect the analysis of the Draft EIR because the Draft EIR refines the estimate, anyway. No revisions to the Draft EIR are necessary.



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**Letter  
5**

Erik C. White, Air Pollution Control Officer

February 22, 2019

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

Subject: Review of Draft Environmental Impact Report for the Sunset Area Plan - Placer Ranch  
 Specific Plan

Dear Ms. Herrington:

The Placer County Air Pollution Control District (District) thanks you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) prepared for the proposed Sunset Area Plan (SAP) and Placer Ranch Specific Plan (PRSP) Project. The District has the following comments on the Project's DEIR for your consideration. Our comments focus on two areas of which the District has expertise; air emissions and odor. First we have some recommendations relating to GHG and criteria pollutants. Then, we will address odor impacts.

1. Table 4.7-2 and Table 4.7-3 of the DEIR should be consistent with the modeling results shown in Appendix K. The following tables are from Appendix K summarizing the total unmitigated and mitigated operational Greenhouse Gas (GHG) emissions from the SAP Area and the PRSP Project at full buildout<sup>1</sup>.

PRSP Operation - Unmitigated		SAP Operation - Unmitigated	
Source	Emissions	Source	Emissions
Area	7,797	Area	934
Energy	35,933	Energy	81,219
Mobile	147,988	Mobile	282,392
Waste	7,109	Waste	10,469
Water	2,177	Water	2,926
<b>Total</b>	<b>201,004</b>	<b>Total</b>	<b>377,940</b>

PRSP Operation - Mitigated		SAP Operation - Mitigated	
Source	Emissions	Source	Emissions
Area	5,185	Area	26
Energy	33,948	Energy	46,112
Mobile	147,988	Mobile	282,392
Waste	7,109	Waste	10,469
Water	1,760	Water	2,346
<b>Total</b>	<b>195,990</b>	<b>Total</b>	<b>341,345</b>

5-1

<sup>1</sup> Appendix K "Air Quality and Greenhouse Gas Emissions Modeling Results" page 3.

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The total unmitigated GHG emissions from the SAP Area in Table 4.7-2 should be 377,940 MTCO<sub>2</sub>e/year and total mitigated GHG emissions from the SAP and PRSP Areas in Table 4.7-3 should be 341,345 and 195,990 MTCO<sub>2</sub>e/year, respectively. In addition, Mitigation Measure 4.7-2b proposes to pay an offset fee to compensate for the project's GHG emissions in excess of 1,100 MTCO<sub>2</sub>e/year. Therefore, the correct GHG emission offsets for the SAP and PRSP Project should be 340,245 (341,345 - 1,100 = 340,245) MTCO<sub>2</sub>e/year and 194,890 (195,990 - 1,100 = 194,890) MTCO<sub>2</sub>e/year, respectively. Furthermore, notwithstanding the comments below in Item 2, the offset fee should be re-calculated based on the same formula used in Mitigation Measure 4.3-3c for the ROG and NO<sub>x</sub> Off-site mitigation fee calculation<sup>2</sup>.

The followings are suggested corrections for Mitigation Measure 4.7-2b:

The net SAP area would generate ~~373,896~~ 341,345 MTCO<sub>2</sub>e/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~372,795~~ 340,245 MTCO<sub>2</sub>e/year for a period of one year. Based on the current average rate of \$12 per metric ton of CO<sub>2</sub>e, the estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal ~~\$5,120,190~~ \$4,082,940 (equivalent to ~~\$0.66~~ \$0.55 per square foot for nonresidential and ~~\$954~~ \$327 per residential unit).

PRSP would generate ~~495,014~~ 195,990 MTCO<sub>2</sub>e/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~493,914~~ 194,890 MTCO<sub>2</sub>e/year, or ~~27.14~~ 27.27 MTCO<sub>2</sub>e/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~~ \$2,338,680 (equivalent to ~~\$955~~ \$327 per residential unit).

5-1  
cont.

2. Mitigation Measure 4.7-2b proposes the purchase of carbon offsets to mitigate the operational GHG emissions from the SAP and PRSP Areas. The measure also includes a mitigation fee calculation based on the current average rate of \$12 MTCO<sub>2</sub>e. The rate used to calculate the mitigation fee could be underestimated -- according to the EIR's statement "*At the time this EIR was written, the average rate ranges from \$8 to \$35 per metric ton of CO<sub>2</sub>e.*" Since the buildout of the SAP and PRSP Project is expected to occur over 80 years or more, the collective mitigation fee paid by the project applicants could not sufficiently satisfy the required GHG emission reduction if the future rate would be more than \$12 per metric ton. For this reason, Mitigation Measure 4.7-2b shall identify the required GHG reduction (MTCO<sub>2</sub>e) for each nonresidential and residential unit instead of a mitigation fee per unit and to require that the project applicant satisfy the emission reduction requirement at the time of recordation of each final map.

5-2

<sup>2</sup> Mitigation Measure 4.3-3c determines the off-site mitigation fee based on a total of 7,146 residential units proposed by the PRSP and a total of 7,289,000 square foot non-residential development and 320 residential units proposed by the SAP, DEIR page 4.3-39



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Mitigation Measure 4.7-2b should explicitly indicate that the project applicant can satisfy the measure by 1) purchasing sufficient local or California-only carbon credits through the accredited carbon credit registries, 2) investing in a local GHG reduction project/program which complies with the approved protocols from the CAPCOA GHG Rx program or CARB's Cap-and-Trade Offset protocols, or 3) paying the calculated mitigation fee based on the carbon credit rate at the time of the recordation of the final map. If the mitigation fee is chosen, the District recommends that the fee should be calculated based on the required GHG reduction and the latest CARB Cap-and-Trade Program Auction Settlement Prices<sup>3</sup> for GHG allowances at the time of the final map recordation.

5-2  
 cont.

Mitigation Measure 4.7-2b also requires that the GHG reduction achieved through an offset or through the purchase of carbon credits must meet several criteria. However, the measure does not establish the mechanism to identify and monitor how the purchased carbon credits satisfy the criteria and how the measure should be implemented by the project applicant. The District recommends that the measure include the identification of individuals or agencies responsible for monitoring and verifying when the mitigation measure is implemented.

3. Impact 4.10-2 states that the proposed project includes an amendment to the County General Plan Policy 4.G.11, which would reduce the buffer around the Western Regional Sanitary Landfill (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. According to the review of the existing odor complaint data from residents beyond the current 1 mile buffer, the DEIR concludes that the proposed SAP and PRSP Project would have potentially significant impacts on the WRSL.

The DEIR's Appendix J includes two odor studies from SCS Engineers: *Review of Odor Management at WRSL* (November 9, 2017) and *Evaluation of Incremental Odor Increase from WRSL* (September 27, 2018). The first study reviewed the existing odor complaint data with landfill odor control practices during that time frame, and confirmed that the proposed SAP and PRSP Project would result in additional odor complaints because of the project allowing development within the existing 1-mile buffer zone.

5-3

The second study conducted a further analysis on the incremental increase in odor emissions and odor impacts that would result from implementation of the SAP and PRSP Project. The report estimated that the incremental odor emissions from the buildout of the proposed SAP and PRSP Project would represent 16 percent of the odor emissions generated at WRSL in 2018 and 8 percent of the odor emissions generated at WRSL in 2058. Additionally, this SCS study also investigated the incremental odor impacts corresponding to the proposed SAP and

<sup>3</sup> CARB Cap-and-Trade Program compliance instrument auction information <https://www.arb.ca.gov/cc/capandtrade/auction/auction.htm>

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PRSP Project. However the results were not explicitly discussed in the DEIR.

The study modeled future odor impacts based on odor emissions, receptor locations to the WRSL, and meteorological conditions taken in June. The results presented as the number of exceedances to a threshold, in dilutions to threshold (DT). The red box drawing on SCS' table shows the locations within the 1-mile buffer zone and the associated number of odor exceedances of 5 DT, 8 DT, and 10 DT. According to the analysis, odor is frequently considered to be offensive when it exceeds 8 DT. The following table4 is from SCS' second study showing modeled odor impacts in 2058 (the time of the WRSL's expected closure) with or without the implementation of the SAP and PRSP Project.

Table 7. Future Odor Impacts

Location	Upscaled Impact in 2058			Upscaled Impact Minus Project			Increase in Exceedance from Project		
	10 DT	8 DT	5 DT	10 DT	8 DT	5 DT	10 DT	8 DT	5 DT
WRSL parking lot	434	566	1059	375	505	938	59	61	121
Closest regional commercial	73	102	178	59	93	164	14	9	14
Mid North boundary of future Sac State	14	40	113	9	28	96	5	12	17
Roundabout at entry to future Sac State	1	7	13	0	3	9	1	4	4
Closest medium density residential	1	1	9	0	1	7	1	0	2
Closest low density residential	0	1	7	0	0	6	0	1	1
William Hughes Park	0	0	5	0	0	4	0	0	1
Leopard Davis Park	0	0	5	0	0	3	0	0	2
Verrazona and Vignolia	0	0	5	0	0	4	0	0	1
Closest high density residential	0	1	4	0	0	4	0	1	0
Greywood Circle	0	0	4	0	0	3	0	0	1
Woodcreek Oaks Safeway	0	0	3	0	0	3	0	0	0
Rainbow Trout	0	0	2	0	0	2	0	0	0
Veterans Park	0	0	2	0	0	2	0	0	0
Settlers Ridge	0	0	2	0	0	2	0	0	0
Dugan Park	0	0	2	0	0	2	0	0	0
Amoruso	0	0	2	0	0	2	0	0	0
Fiddymont Farm Elementary	0	0	2	0	0	2	0	0	0
Mel Hamel Park	0	0	2	0	0	1	0	0	1

The red box on above table shows the locations of future development created by the SAP and PRSP Project, within 1-mile buffer zone. According to the number of exceedances under the "Upscaled Impact Minus Project" column, the total number of odor impacts exceeding 8 DT are 193, all which occur in the new SAP and PRSP Areas. The total number of exceedances

5-3  
cont.

4 Appendix J "Evaluation of Incremental Odor Increase from Western Regional Sanitary Landfill" page 31.

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for the rest of the locations located outside of the 1-mile buffer zone is 0. This analysis is based on the month of June, which is not a peak month for odor complaints – the majority of odor complaints come in the winter and spring months.

According to the increase from **0** to **193** odor impact exceedances in the month of June in 2058, the SCS study clearly indicate that reducing the 1-mile buffer zone around the WRS� would substantially increase odor impacts with the implementation of the SAP and PRSP Project by placing people in much closer proximity to the WRS� -- even without consideration of any additional project-generated odors and in a month with very low odor complaints based on the current odor complaint history.

Furthermore, it can be reasonably interpreted that the SAP and PRSP Project would be expected to result in a more significant increase in odor impacts during the peak winter and spring months, again because of the project’s proposal to reduce the 1-mile buffer zone to the WRS�.

The DEIR points to several studies regarding implementation of on-site odor controls at landfill sites within California to remediate odor complaints. However, the DEIR states that these measures will not be considered because they are beyond the jurisdiction of Placer County. The DEIR’s impact discussion acknowledges an increase in future odor complaints created by the SAP and PRSP Project due to land use incompatibility. It goes on to acknowledge that this will place pressure or legal actions on the Western Placer Waste Management Authority (WPWMA) to implement additional odor control and reduction measures at the WRS�. Accordingly, the DEIR proposes to place the burden of mitigating the odor complaints to the public, enforcement agencies (such as the District), WPWMA, and the courts, rather than the project components in order to mitigate the land use incompatibility created by the approval of the SAP and PRSP Project. The odor problem will be exacerbated by new residential development from the SAP and PRSP Project that are closer to the landfill site; development which previously would have been prohibited by the one-mile buffer zone required by the County’s General Plan Policy.

The DEIR states that one option for the WPWMA may be to increase the solid waste service fee for all service areas (those areas of Placer County west of the city limits of Colfax which includes passing the increased solid waste service fees to the public) to cover future expenditure requirements for odor control and mitigation at the WRS�. These expenditures may include implementing additional odor control measures, paying litigation costs, transporting solid waste to the other landfill sites, such as the Ostrom Road Landfill site located in Yuba County (which has a current public environmental document for a proposal to receive solid waste from the Bay Area), or relocating the WRS� facility to another area. These potential scenarios would likely have very significant economic impact on WRS�.

5-3  
cont.

Ms. Shirlee Herrington  
February 22, 2019  
Page 6 of 7

operations, as well as the jurisdictions within Western Placer County, including the cities of Lincoln, Roseville, and Rocklin.

As the DEIR states, the WPWMA is working on its Waste Action Plan to address future WRSL operational needs. The plan will identify operational options and analyze the options based on a variety of factors, including economics and odor impacts. Placer County is a member of the WPWMA's Board of Directors who oversees the operation of the WRSL. The District strongly recommends that the County, as the lead agency under CEQA and a WPWMA Board member, requires the project applicant to commit to working with the WPWMA to develop an odor mitigation plan as a mitigation measure. The potential plan shall identify additional effective and proactive on-site mitigation measures with necessary financial assistance, through the WPWMA Waste Action Plan process, to reduce undesirable odor impacts resulting from the proposed project's land use conflicts. The following are some suggested actions to be included in the proposed plan as mitigation for reducing odor impacts:

5-3  
cont.

- Increase the capture efficiency of landfill gas through use of more vertical and horizontal wells and stronger blower fan and trace gas evaluation testing.
- Enhanced cover of landfill areas using tarps, thicker layers of cover, permeable membrane, "Enviro" cover, "Posishell" cover, "closure" turf, compacting soil, and/or "enhanced" material such as vegetation, compost, green waste.
- Improved leachate management.
- Improved compost management using state of the art aeration methods.

The District can work with the County and WPWMA to monitor implementation of the mitigation measures.

4. The DEIR Section 4.13 addresses the potential impacts of the project on public services, including fire protection and emergency services, law enforcement, school, parks and recreation facilities, and library services. The DEIR Impacts 4.3-6 and 4.10-2 all conclude that the proposed SAP and PRSP Project will result in significantly incremental increases of odor emissions and odor impacts to both the existing community as well as to the new development, and a corresponding increase in complaints that the District must investigate and resolve. Thus, this section should discuss the District's role in providing public services and identify mitigation measures for our increased need for resources to deal with odor complaints -- such as direct funding support to offset the costs for these additional services if the proposed project is approved.

5-4

Although the District is not identified by the DEIR for public service analysis, the District is a

Ms. Shirlee Herrington  
February 22, 2019  
Page 7 of 7

public agency, as defined by California Health and Safety Code<sup>5</sup>. We are responsible for addressing public nuisance, including odors resulting from the discharge of air emissions from any source<sup>6</sup>. As we discuss in the previous comment, the buildout of the SAP and PRSP Project will result in significant incremental increases of odor emissions and odor complaints due to its land use incompatibility. Additional odor complaints received by the District will require resources for investigation, response, and resolution. The District may need to adopt and enforce additional odor control regulations to address the increased number of public complaints regarding odors from the WRSL.

Providing the public with these services, including responding to an increased number of public nuisance complaints over a broader area, odor enforcement activities, and potential litigation for violations, will place a significant financial burden on the District. Without funding support, these costs may be passed on as per capita fees to jurisdictions served by the District, through permit fees upon Placer County businesses, or as fees to be paid by WRSL that will be passed on to the public through increased solid waste service fees. The District is willing to work with the County to identify necessary resources to provide services in responding to an increased number of odor complaints resulting from the buildout of the SAP and PRSP Project.

5-4  
cont.

Thank you again for the opportunity to review and comment on the DEIR. If you have any questions, please feel free to contact me at 530-745-2325 or [ychang@placer.ca.gov](mailto:ychang@placer.ca.gov).

Sincerely,



Yushuo Chang  
Planning and Monitoring Section Manager  
Placer County Air Pollution Control District

Cc: Erik White, Air Pollution Control Officer  
Christiana Darlington, District Counsel  
Bruce Springsteen, Compliance and Enforcement Section Manager  
Ann Hobbs, Associate Planner

---

<sup>5</sup> California Health and Safety Code §40000  
<sup>6</sup> California Health and safety Code §41700

**Letter  
5**

Placer County Air Pollution Control District  
Yushuo Chang, Planning and Monitoring Section Manager  
February 22, 2019

- 5-1 The comment correctly identifies a discrepancy between the modeling results presented in Appendix K of the Draft EIR and Tables 4.7-2 and 4.7-3 in Section 4.7 of the Draft EIR. In response to this comment, 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 <sub>2</sub> e/year)	
	Net SAP Area at Buildout	PRSP Area at Buildout
Hearths and landscape equipment	<del>1,512</del> <u>934</u>	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
<b>Total operational annual GHG emissions</b>	<del>378,518</del> <u>377,940</u>	<b>201,004</b>
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<sub>2</sub>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

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

**Table 4.7-3 Mitigated Operation-Related Greenhouse Gas Emissions**

Emissions Activity	GHG Emissions (MTCO <sub>2</sub> e)	
	Net SAP Area	PRSP Area
Landscape equipment	<del>934</del> <u>26</u>	5,185
Electricity Consumption	<del>32,840</del> <u>26,555</u>	15,715
Natural gas combustion	<del>44,914</del> <u>46,112</u>	<del>17,257</del> <u>18,233</u>
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 <sub>2</sub> e/year	1,100 MTCO <sub>2</sub> e/year
PCAPCD Bright-Line Threshold	10,000 MTCO <sub>2</sub> e/year	10,000 MTCO <sub>2</sub> e/year
<b>Total operational annual GHG emissions</b>	<del>373,895</del> <u>367,900</u>	<del>195,014</del> <u>195,990</u>

Notes: Totals may not add because of rounding; GHG = greenhouse gas; MTCO<sub>2</sub>e = metric tons of carbon dioxide equivalent; SAP = Sunset Area Plan; PRSP = Placer Ranch Specific Plan.

Source: Modeling conducted by Ascent Environmental in 2018

This discrepancy also carried into the language for Mitigation Measure 4.7-2b, as pointed out in the comment. The comment provides specific revisions to the mitigation measure text. Comment 5-2 also raises issues with this mitigation measure that require revision; therefore, revisions to Mitigation Measure 4.7-2b are provided in responses to comment 5-2 below.

- 5-2 The comment acknowledges the long-term buildout of the project and the potential for carbon offset prices to vary drastically over the 80-year period. Rather than provide anticipated cost of carbon offsets, the comment suggests that the amount of greenhouse gas (GHG) emissions that need to be offset is provided in Mitigation Measure 4.7-2b by residential and nonresidential unit rather than a price per unit. This comment also suggests that additional language be added to Mitigation Measure 4.7-2b to identify the entities responsible for monitoring and verifying the purchase of carbon offset credits. In response to the comment, 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 MTCO<sub>2</sub>e 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 CO<sub>2</sub>e.

The net SAP area would generate ~~373,896~~ 367,900 MTCO<sub>2</sub>e/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~372,795~~ 366,800 MT CO<sub>2</sub>e for a period of one year, or 49.13 MTCO<sub>2</sub>e/year per thousand square feet of nonresidential development and 27.27 MTCO<sub>2</sub>e/year for each residential unit in the net SAP area. Based on the current average rate of \$12 per metric ton of CO<sub>2</sub>e, 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 MTCO<sub>2</sub>e/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~193,914~~ 194,890 MTCO<sub>2</sub>e, or ~~27.14~~ 27.27 MTCO<sub>2</sub>e/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 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 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 Placer County Planning Division 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 final map recordation or building permit issues 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.~~

- 5-3 The comment raises issues with the Draft EIR's presentation of odor study results, the characterization of effects related to adjusting the landfill buffer, and application of mitigation measures. See Master Response 4: Odors regarding discussion of odor impacts in the Draft EIR.
- 5-4 The comment suggests that PCAPCD is a public service and should have been included in the Draft EIR's evaluation of impacts on public services. See Master Response 4: Odors regarding potential economic impacts on PCAPCD resulting from the proposed project.





County of Placer  
**Fish and Game Commission**  
11477 E Avenue ▪ Auburn, CA 95603 ▪ (530) 889-7372

District 1 – Don Gould  
District 2 – Mark Fowler  
District 3 – Jim Victorine  
District 4 – Gary Flanagan  
District 5 – Karl Freidig  
District 5 – Mickey Daniels  
District 5 – Scott Husmann

Letter  
6

Shirlee Herrington  
Placer County Planning Services Division  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

**RE: Sunset Area Plan/Placer Ranch Specific Plan Draft Environmental Impact Report  
Comments**

Dear Ms. Herrington:

On June 27, 2018, the Fish and Game Commission received an informational report and overview by Crystal Jacobsen, Placer County Principal Planner, regarding the Sunset Area Plan and Placer Ranch Specific Plan. The Commissioners also reviewed the DEIR for the project.

Upon review and discussion of the impacts and proposed mitigation measures for waters, aquatic life, fish, plants and wildlife, along with the immensity and scope of the project, it is clear that there will be potentially significant adverse effects and impacts to the environment and to these resources in the development area. Some adverse impacts were listed as not only "significant", but also "unavoidable". Our natural resources, plants, fish, wildlife and their habitat are not the winners in this proposed project.

Therefore, during the January 23, 2019, Fish & Game Commission meeting the Commission voted unanimously (5 in favor, 1 recusal, 1 absent) to recommend that the Board of Supervisors adopt "Alternative 3" of the draft environmental impact report for the Sunset Area Plan and Placer Ranch Specific Plan. This alternative includes a reduced footprint and reduced land development for the designated area. Our recommendation *increases* total acres in preserves to 3,600 and *reduces* the total area subject to development compared to the current proposed project.

We believe that the modifications included in Alternative 3 are in the best interest of the native plants, aquatic life, water systems, fish and wildlife of Placer County.

Sincerely,

A handwritten signature in black ink, appearing to read "Mickey Daniels".

Mickey Daniels, Vice Chair  
Placer County Fish & Game Commission

cc: Bonnie Gore, Supervisor, District 1  
Robert Weygandt, Supervisor District 2  
Kirk Uhler, Supervisor, District 4  
Jennifer Montgomery, Supervisor, District 5  
Todd Leopold, County Executive Officer



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<b>Letter 6</b>	Placer County Fish and Game Commission Mickey Daniels, Vice Chair No date
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- 6-1 The comment recommends that the Placer County Board of Supervisors adopt Alternative 3. As described in Section 6.5, “Environmentally Superior Alternative,” of the Draft EIR, besides the No-Project–1997 SIA Plan Alternative, Alternative 3 is considered environmentally superior because it results in the greatest reduction of impacts, and it appears to meet most of the project objectives.

The comment is directed toward the project approval process and does not address the content, analysis, or conclusions in the Draft EIR. All comment letters submitted during the Draft EIR public review period will be reviewed and considered by the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.



PLACER COUNTY WATER AGENCY  
SINCE 1957  
BOARD OF DIRECTORS  
Gray Allen, District 1  
Primo Santini, District 2  
Mike Lee, District 3  
Robert Dugan, District 4  
Joshua Alpine, District 5  
Einar Maisch, General Manager

BUSINESS CENTER  
144 Ferguson Road  
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Auburn, CA 95604  
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(530) 823-4850  
(800) 464-0030  
WWW.PCWA.NET

Letter  
7

January 31, 2019

Ms. Shirlee I. Herrington  
Placer County Planning Services Division  
3091 County Center Drive, Suite #190  
Auburn, CA 95603

RE: Sunset Area Plan / Placer Ranch Specific Plan (PLN16-00341), Draft Environmental Impact Report  
Released for Public Review and Comment (February 22, 2019)

Dear Ms. Herrington:

In review of the subject documents, PCWA offers the following comments and may provide additional comments in the future as necessary:

Comments on the following sections of the draft EIR

03-Project Description

- |   |  |     |
|---|--|-----|
| <ol style="list-style-type: none"> <li>1. Per a meeting held on September 10, 2018, County staff agreed to include in this EIR the 42-inch pipeline from highway 65 to the eastern boundary of Placer Ranch. It appears that this document excludes pipelines outside of the Placer Ranch Specific Plan (PRSP). Exhibit 3-3, 3-19, 3-24 and page 3-66 does not incorporate the pipeline within this document. (Michele will talk with Ascent about how this was or was not incorporated).</li> </ol>  | <span style="font-size: 3em;">}</span> | 7-1 |
| <ol style="list-style-type: none"> <li>2. Exhibit 3-3 shows PCWA Pipeline Alignment within Placer Parkway; however, the pipeline will be a transmission main through PRSP, as shown in Exhibit 3-19. The 42-inch pipeline should be included within this EIR, currently areas east of PRSP appear to not be included.</li> </ol>  | <span style="font-size: 3em;">}</span> | 7-2 |
| <ol style="list-style-type: none"> <li>3. Exhibit 3-19 should show Sunset Area Point of Connection (POC) at west area, label all PCWA connections as POCs, not interties. Also should show offsite treated water pipeline extension to highway 65 and included in this EIR.</li> </ol>  | <span style="font-size: 3em;">}</span> | 7-3 |
| <ol style="list-style-type: none"> <li>4. Page 3-26 and Exhibit 3-3 should show offsite recycled water pipeline extension and included in this EIR.</li> </ol>  | <span style="font-size: 3em;">}</span> | 7-4 |
| <ol style="list-style-type: none"> <li>5. This project is building a pressure reducing station at Campus Park Boulevard and Foothills Boulevard. This site should also include a possible future pump station. Please include discussion of a parcel for this infrastructure and modify language to get project level clearance for CEQA moving forward. This site would be granted to PCWA in fee. Criteria was discussed for this parcel and requirements were given at a meeting between PCWA and County staff on September 10, 2018.</li> </ol> | <span style="font-size: 3em;">}</span> | 7-5 |
| <ol style="list-style-type: none"> <li>6. There is no agreement in place for PCWA being the recycled water purveyor. Although anticipated, please revise areas where PCWA is listed as the recycled water purveyor. Page 3-53 list "The City of Roseville provides wholesale recycled water to PCWA, which would serve as the recycle water retailer for the PRSP area". PCWA does not retail recycled water yet, PCWA's 2015 UWMP does anticipate serving recycled water within this area.</li> </ol>  | <span style="font-size: 3em;">}</span> | 7-6 |

#### 4.15 Utilities

- |  |      |
|--|------|
| 1. Potable Water Master Plan and Recycled Water Master Plan, Appendix F and G respectively, have date May 2017; however, the report and PCWA approved documents are July 18, 2017.   | 7-7  |
| 2. Provide a figure or narrative delineating the separation of the utilities within the roadway; ensuring Title 22 requirements are met.   | 7-8  |
| 3. 4.15-4 PCWA has deferred the first phase of the Ophir WTP past 2019. Suggest rewording sentence to “The Ophir WTP has not yet been constructed, and timing is generally dependent on anticipated need. Plans to begin construction on the first phase of the Ophir WTP and associated conveyance pipelines, would provide treatment capacity of 10 mgd.” Note, the design and permitting have been completed and construction will begin upon anticipated demand.   | 7-9  |
| 4. Page 4.15-19 Water Conservation: SB 606 and AB 1668 have been passed since the completion of the water master plans. These conservation measures authorize further water efficiency measures beyond SB x7-7, moving away from a comprehensive GPCD target. Even though water efficiency standards have not been fully established, this project should address how the new measures apply.  | 7-10 |
| 5. General: Policy 4.C.1. Per the Potable Water Master Plan, It is the intent of [the project] that two groundwater wells at either Parcels PR-93, PR-96 PR-97 would each have a projected capacity of 1.0 MGD, or approximately 695 GPM, and groundwater is of such quality that only disinfection will be required to meet California Drinking Water Quality Standards. If the available capacity or water quality does not achieve these objectives, the Developer shall, at its own costs, work with PCWA to relocate the well site within the Project to an alternate mutually agreeable site until these objectives are satisfied. Furthermore, the developer shall conduct groundwater study on the sub-basin’s water quality, with emphasis on how the basin may be affected by new domestic wells in proximity to landfill. Policy 4.C.1 partially addresses the comment, but more is needed, including, but not limited to: cost bore, other sites, if necessary, etc. | 7-11 |
| 6. PR-97, parcel for the recycled water tank, pump station and well, went from 2.14 acres to 1.09 acres in the revised land use plan; however, no site plan was submitted to the Agency for approval. A site plan shall be submitted to confirm adequacy of property. With screening requirements of the infrastructure, the existing site may not be adequate. For tank and pump station locations, suggest screening to occur offsite where feasible – adjacent to park or open space areas.   | 7-12 |
| 7. Update the existing water distribution map (Exhibit 4.15-1) with current infrastructure. This infrastructure appears to be approximately 3 years old and several distribution mains appear to be not represented within this map. Distribution maps can be obtained by contacting <a href="mailto:brickards@pcwa.net">brickards@pcwa.net</a>  | 7-13 |
| 8. 4.15-40, “The Foothill WTP and Sunset WTP have approximately 1.8 mgd of capacity (as of January 2019) remaining” This document states 2.5 mgd, which is approximately 2 years old.  | 7-14 |
| 9. 4.15-40, Note that the 5.16 MG potable water storage tank will be co-located with a pump station and a lay-down yard for supplies.  | 7-15 |

In addition to the review of the draft EIR, PCWA offers the following edits of the Sunset Area Plan and the Placer Ranch Specific Plan. These comments have been carried over from previous Specific Plan comments that were provided as a PDF markup that were not addressed.

**Placer Ranch Specific Plan Comments:**

- |   |   |      |
|---|---|------|
| <ol style="list-style-type: none"> <li>1. The treated water tank site should mention a pump station, an adjacent building, and lay down area for storage of parts and equipment.</li> </ol>   | <div style="border-left: 1px solid black; height: 20px; margin: 0 auto; width: 10px;"></div>  | 7-16 |
| <ol style="list-style-type: none"> <li>2. PCWA should be listed as the potable water purveyor for the region with specific reference to PCWA's Standards regarding water supply, storage, and distribution system infrastructure. Design standards for recycled water should be per the recycled water purveyor.</li> </ol>   | <div style="border-left: 1px solid black; height: 20px; margin: 0 auto; width: 10px;"></div>  | 7-17 |
| <ul style="list-style-type: none"> <li>• Specific Plan Section 9 Utilities               <ul style="list-style-type: none"> <li>○ Page 09-2                   <ul style="list-style-type: none"> <li>▪ Add "of acceptable water quality" to the requirements of the wells within the Water Supply &amp; Demand paragraph</li> <li>▪ Add "corridor, PR-87" after "via the Placer Parkway" in bottom-right paragraph and delete "roadway corridors"</li> </ul> </li> <li>○ Page 09-4                   <ul style="list-style-type: none"> <li>▪ Reword the recycled water retailer to "PCWA or Placer County" in bottom-right paragraph. Improvements are to be constructed to retailer's standard</li> <li>▪ Wells are to be constructed to PCWA's standard, not Placer County.</li> <li>▪ PCWA is misspelled in second paragraph</li> </ul> </li> </ul> </li> <li>• Specific Plan Section 10 Implementation               <ul style="list-style-type: none"> <li>○ Page 10-6                   <ul style="list-style-type: none"> <li>▪ Revise entry of Maintenance Funding under Water Infrastructure row in Table 10-1 from "User Fees" to "PCWA fee"; also, add Table 10-1 to Table of Contents. See next comment.</li> <li>▪ Add Placer County Water Agency as a potential recycled water provider, current listing shows Placer County. Maintenance Funding of water and recycled water infrastructure should be the same.</li> </ul> </li> <li>○ Page 10-7                   <ul style="list-style-type: none"> <li>▪ Clarification on Public Agency Impact Fees paragraph: PCWA is not part of the building permit process and permits can be pulled without connection charges assessed. PCWA does require a developer to enter into a Facility Agreement for funding and installation of facilities which can happen after issuance of a building permit</li> <li>▪ Other maintenance funding options listed in Table 10-1 should be described in maintenance funding options description (e.g., User Fee and Property Tax)</li> </ul> </li> </ul> </li> <li>• Development Standards Section 5 Public Facilities               <ul style="list-style-type: none"> <li>○ Page 05-4                   <ul style="list-style-type: none"> <li>▪ General Notes                       <ul style="list-style-type: none"> <li>• If the available capacity or water quality of the groundwater does not achieve PCWA standards, the developer shall work with PCWA to relocate well site within Project to an alternate mutually agreeable site such that objectives are satisfied.</li> <li>• Developer shall conduct groundwater study on the sub-basin's water quality, with emphasis on how the basin may be affected by new domestic wells in proximity to landfill</li> </ul> </li> <li>▪ Replace "Placer County standards" with "all applicable codes" in the first requirement of Potable Water Facilities</li> <li>▪ Revise second requirement to say "Placer County Code, Division of Drinking Water, and PCWA requirements"</li> </ul> </li> </ul> </li> </ul> | <div style="border-left: 1px solid black; height: 600px; margin: 0 auto; width: 10px;"></div> | 7-18 |

- Revise fourth requirement to say “Groundwater wells, the PRV station at Foothills and Campus Park, and pumping stations...”
  - Page 05-5
    - Standards that apply to the water infrastructure solely is on the purveyor. For treated water it will be PCWA, for recycled water the document should allow for PCWA or Placer County – keeping the language general may be best.
- Design Guidelines Section 2 Landscape Architecture
  - Page 02-10
    - In general, pipelines should be within paved areas. Where select pipelines are within landscape corridors, trees and shrubs shall be prohibited within 10 feet of any water main

7-18  
cont.

**Sunset Area Plan Comments:**

- Part II Section 9 Implementation
  - 9-5 Infrastructure Finance #5
    - Note that portions of the Sunset Area is within the City of Lincoln’s Sphere of Influence (specifically the Urban Reserve). Lincoln is a retailer for all areas within the City’s boundary and responsible for collecting connection charges.

If you have any questions or require additional information, please contact Brian Rickards at (530) 823-4845.

Sincerely,

Anthony L. Firenzi, P.E.  
Deputy Director of Technical Services

TF:BR:sw

**Letter  
7**

Placer County Water Agency  
 Anthony L. Firenzi, P.E., Deputy Director of Technical Services  
 January 31, 2019

- 7-1 The comment indicates that the PCWA water line is not mentioned in the Draft EIR once it leaves the Placer Parkway right-of-way. As noted in comment 8-1, page 3-66 of the Draft EIR states, “Water and Wastewater Infrastructure outside the PRSP Area,” first bullet point. This section describes the Placer Parkway water lines as included in the definition of “other supporting infrastructure.” Exhibit 3-3 of the Draft EIR clearly shows the PCWA pipeline alignment, including the segment between SR 65 to the eastern boundary of the PRSP area. (Note: See revised Exhibit 3-3 in Chapter 2, “Revisions to the Draft EIR,” which shows the corrected PCWA pipeline alignment within the PRSP area.) The Draft EIR (page 3-53) explains how the PRSP water distribution system would intertie with PCWA’s transmission and distribution system:

along the eastern edge of the plan area at Placer Parkway, Sunset Boulevard, and Nichols Road and would interconnect with the SAP potable water distribution system. The primary transmission backbone would be a 42/36-inch transmission main that would extend from the Placer Parkway tie-in to the western edge of the plan area via the Placer Parkway and Campus Park Boulevard roadway corridors. This would include a linkage to the proposed water storage tank. In addition to delivering water to the PRSP area, the transmission pipeline would also serve portions of the SAP area outside the PRSP area.

The Draft EIR provides further detail regarding the PCWA pipelines on page 3-66 indicating that the three 24-inch water lines would connect together west of the Whitney Ranch interchange into a 42-inch water line. This 42-inch water line would continue west for approximately 5,000 feet from the interchange within the Placer Parkway alignment to the eastern boundary of the PRSP area. This project infrastructure would be installed by PCWA as part of the PCWA Ophir Phase 1 and Phase 2 Infrastructure Project. The 42-inch line in Placer Parkway would become a 30-inch line west of the water tank proposed for the PRSP area. The Draft EIR (page 3-66) indicates that the water lines in Placer Parkway and the SR 65/Whitney Ranch Parkway interchange have already been approved with a certified EIR.

The Draft EIR (page 4-6) describes the organization of the impact analysis noting that each impact discussion is divided into the following subsections and includes a separate CEQA conclusions for each: the net SAP area, PRSP area, and other supporting infrastructure. The Placer Parkway water line falls under other supporting infrastructure as it is defined. Therefore, the conclusions for other supporting infrastructure include the Placer Parkway water by reference/definition of the other supporting infrastructure.

- 7-2 The comment states that Draft EIR Exhibit 3-3 does not correctly reflect the planned location of PCWA’s 42-inch pipeline and that portions of the pipeline east of the PRSP area are not included. See revised Exhibit 3-3 in Chapter 2, “Revisions to the Draft EIR,” which shows the corrected PCWA pipeline alignment within the PRSP area.
- 7-3 The comment requests that Draft EIR Exhibit 3-19 be updated to show the Sunset Area Point of Connection (POC) at the west area and that all PCWA connections be labeled as POCs, not interties. See revised Exhibit 3-19 in Chapter 2, “Revisions to the Draft EIR.”
- 7-4 The comment states that Draft EIR page 3-26 and Exhibit 3-3 should be revised to show offsite recycled water pipelines. Page 3-26 of the Draft EIR describes improvements within the SAP area, not off-site improvements. Improvements located outside of the project area are discussed on page 3-71. These include a description of recycled water pipelines. Also, Exhibit 3-3 shows PRSP-related infrastructure outside the PRSP area but within the SAP area (shown in green on the exhibit). Exhibit 3-3 also shows other supporting infrastructure evaluated in the EIR, which includes improvements

outside of the SAP boundary. Except for the PCWA pipeline alignment, Exhibit 3-3 is not intended to show specific types of pipelines and other improvements, but rather shows the areas where those improvements would be installed in order to inform the environmental analyses. Adding the recycled water pipelines to this graphic would result in the need to identify other specific types of infrastructure, which would require a level of detail that would not be supported by this graphic and would not help inform the environmental analysis of the Draft EIR. No revisions to the Draft EIR are necessary.

- 7-5 The comment seeks identification of pressure reducing station. Exhibit 3-19 in the Draft EIR shows proposed locations for PRV/PSV Stations, which are further detailed in the Placer Ranch Potable Water Master Plan. These stations will also be noted on the Large Lot Final Map for the PRSP.
- 7-6 The comment states that there is no agreement in place for PCWA to be the recycled water purveyor for the project, and that PCWA does not anticipate serving recycled water within the PRSP area, per PCWA's 2015 UWMP. In response to this comment, 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).

- 7-7 The commenter points out that the dates of the Potable Water Master Plan and Recycled Water Master Plan included as appendices to the Draft EIR are not consistent with later versions. As discussed in Chapter 2, "Revisions to the Draft EIR," May 2017 versions of several utilities master plans were included as appendices rather than the more current July 2017 versions. The July 2017 versions are included as Appendices A, B, and C of this Final EIR.
- 7-8 The comment requests a figure or narrative be added to the Draft EIR delineating the separation of utilities within roadways ensuring Title 22 requirements are met. The project is required to meet all local, state, and federal codes, including California Title 22 health and safety code. The Draft EIR does not need to provide details regarding how, specifically, the project would meet the code requirements. No revision to the Draft EIR is required.
- 7-9 The comment suggests a minor correction to the third paragraph on page 4.15-4 of the Draft EIR related to the timing of the Ophir water treatment plant (WTP). Consistent with the requested text change, 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 t~~The 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).~~

- 7-10 The comment suggests changes to the text regarding recently passed water conservation legislation. Specifically, the comment request that AB 1668 and SB 606 be discussed in the Draft EIR. SB 606 and AB 1668 establish guidelines for efficient water use and a framework for the implementation and oversight of the new standards, which must be in place by 2022. The two bills strengthen the state's water resiliency in the face of future droughts with provisions that include:



- ▲ Establishing water use objectives and long-term standards for efficient water use that apply to urban retail water suppliers; comprised of indoor residential water use, outdoor residential water use, commercial, industrial and institutional (CII) irrigation with dedicated meters, water loss, and other unique local uses.
- ▲ Providing incentives for water suppliers to recycle water.
- ▲ Identifying small water suppliers and rural communities that may be at risk of drought and water shortage vulnerability and provide recommendations for drought planning.
- ▲ Requiring both urban and agricultural water suppliers to set annual water budgets and prepare for drought.

These new regulations, which were passed in the legislature after the NOP was released, will apply to water suppliers and retailers and require long-term planning and efficiency standards. It is too early to understand, specifically, how (or if) these regulations might affect development in the project area; therefore, no revisions to the Draft EIR are provided. Also, the SAP and PRSP already include water efficiency measures that would be required for future development, and the County's WELO further enhances water efficiency.

- 7-11 The comment notes that General Plan Policy 4.C.1 does not go far enough to address issues related to water quality associated with proposed on-site wells. In response to this comment 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.

The comment does not identify any issues with the analysis or adequacy of the Draft EIR. Other than the SAP policy edit identified above, which supplements General Plan Policy 4.C.1, no further revisions to the Draft EIR are required.

- 7-12 The comment notes that parcel PR-97 identified as the location for the recycled water tank changed in size from 2.14 acres to 1.09 acres in the revised land use plan. The comment states that no site plan for the smaller site was submitted to PCWA and that the existing site may not be adequate. The comment also suggests that screening of tanks and pump stations should occur off-site, where feasible. The Draft EIR did include an exhibit in the Placer Ranch Recycled Water Master Plan (Appendix G of the Draft EIR, Figure 4-2) that showed a recycled water tank facility could fit on 0.92 acre. Even though the parcel at the time of the study was 2.14 acres, it only utilized 0.92 acre for the tank and infrastructure. Screening of tanks and pump stations could also occur off-site on adjacent Open Space areas if necessary. Further, the County coordinated with PCWA regarding a site plan and design details for the updated PR-97 site. No changes to the Draft EIR are required.
- 7-13 The comment suggests updating Draft EIR Exhibit 4.15-1 to reflect current infrastructure. The Draft EIR used current information available at the time to establish the baseline. Minor updates in the infrastructure data do not require changes in the analysis or conclusions of the Draft EIR.

Additionally, the SAP is analyzed at a program level in the Draft EIR, and future projects will be required to study and show the most up-to-date infrastructure at that time.

- 7-14 The comment suggests a change to the text on page 4.15-40 of the Draft EIR regarding available capacity at the Foothill WTP and Sunset WTP. The comment provides a 2019 capacity update for the Foothill WTP and Sunset WTP. The Draft EIR provided the capacity as it was reported by PCWA in 2017, which was after release of the NOP (November 2016). This updated capacity estimate would not change the conclusions of the Draft EIR; therefore, no revisions are necessary.
- 7-15 The comment suggests a clarification to the text on page 4.15-40 of the Draft EIR regarding the potable water storage tank. Similar to the discussion in response to comment 7-12, the Draft EIR's evaluation of the recycled water tank was not based on a detailed, parcel-level site plan of the tank site. However, in response to the comment, the following additional minor details are added to page 4.15-40 of the Draft EIR:

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.

- 7-16 The comment seeks amendments to the PRSP. No changes to the Draft EIR are requested. The PRSP, Section 9, Section B. Potable Water will be amended to reflect that the treated water tank site should mention a pump station, an adjacent building and lay down area for storage of parts and equipment. No revisions to the Draft EIR are necessary.
- 7-17 The comment requests changes to the PRSP. No changes to the Draft EIR are requested. The PRSP text will be revised to describe the design standards of the recycled water purveyor. No revisions to the Draft EIR are necessary.
- 7-18 The comment seeks minor text amendments to the PRSP and SAP. No changes to the Draft EIR are requested. The PRSP and SAP have been amended to address the comments noted. No revisions to the Draft EIR are necessary.

**From:** Crystal Jacobsen  
**Sent:** Tuesday, February 19, 2019 7:47 AM  
**To:** Shirlee Herrington; Leigh Chavez  
**Subject:** FW: Placer Ranch meeting follow up

<p>Letter 8</p>
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FYI

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**From:** Brian Rickards [mailto:brickards@pcwa.net]  
**Sent:** Friday, February 15, 2019 3:20 PM  
**To:** Michele Kingsbury <MKingsbu@placer.ca.gov>  
**Cc:** Tony Firenzi <tfirenzi@pcwa.net>; 'Vance Jones' <vjones@msce.com>; Crystal Jacobsen <CJacobse@placer.ca.gov>; Leigh Chavez <LChavez@placer.ca.gov>; Mike Parker <mike.parker@ascentenvironmental.com>; Sydney Coatsworth <sydney.coatsworth@ascentenvironmental.com>  
**Subject:** RE: Placer Ranch meeting follow up

Michele,  
 Thank you and Ascent. I appreciate your response. I will update PCWA's letter to include some language below; although we will still make the comment to provide additional clarity.

8-1

Thank you, have a good weekend!  
 Brian

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**From:** Michele Kingsbury [mailto:MKingsbu@placer.ca.gov]  
**Sent:** Thursday, February 14, 2019 3:31 PM  
**To:** Brian Rickards <brickards@pcwa.net>  
**Cc:** Tony Firenzi <tfirenzi@pcwa.net>; 'Vance Jones' <vjones@msce.com>; Crystal Jacobsen <CJacobse@placer.ca.gov>; Leigh Chavez <LChavez@placer.ca.gov>; Mike Parker <mike.parker@ascentenvironmental.com>; Sydney Coatsworth <sydney.coatsworth@ascentenvironmental.com>  
**Subject:** RE: Placer Ranch meeting follow up

Brian – hopefully below helps answer some questions.

1. PRS fee parcel. I believe you and Vance had spoken on how the LLTM will address that comment. If you need more information, please let me know.
2. Placer Parkway Pipeline from SR 65 to eastern edge of PRSP see page 3 – 66, “Water and Wastewater Infrastructure outside the PRSP Area”, first bullet point. This section describes the Placer Parkway water lines as included in the definition of “Other Supporting Infrastructure.”. Page 4-6 describes the DEIR approach which notes that “each impact discussion is divided into the following subsections and includes a separate CEQA conclusions for each:...The Net SAP Area, PRSP Area, and Other Supporting Infrastructure.” The Placer Parkway water line falls under Other Supporting Infrastructure as it is defined. Therefore, when you read each impact section, the conclusions for Other Supporting Infrastructure include the Placer Parkway water by reference / definition of the Other Supporting Infrastructure.

Let me know if this makes sense. Michele

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**From:** Brian Rickards [mailto:brickards@pcwa.net]  
**Sent:** Wednesday, February 13, 2019 11:46 AM  
**To:** Michele Kingsbury

1

**Cc:** Tony Firenzi; 'Vance Jones'

**Subject:** RE: Placer Ranch meeting follow up

Hi Michele,

I just spoke with Vance Jones and he said all of the Specific Plan comments are minor and easily addressed. In one month we will be working on carving out a parcel in the LLTM at Campus Park Blvd and Foothills for a Pressure Reducing Station, with possible future pump station.

I plan on finalizing my comment letter on Friday, please let me know if your discussion with Ascent changes the content of the letter. I will include all comments to the Specific and Area Plan.

Thank you,  
Brian Rickards

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**From:** Michele Kingsbury [<mailto:MKingsbu@placer.ca.gov>]

**Sent:** Friday, February 08, 2019 8:57 AM

**To:** Brian Rickards <[brickards@pcwa.net](mailto:brickards@pcwa.net)>

**Subject:** Re: Placer Ranch meeting follow up

I will follow up

Sent from my iPhone

On Feb 8, 2019, at 8:39 AM, Brian Rickards <[brickards@pcwa.net](mailto:brickards@pcwa.net)> wrote:

Good Morning Michele,  
Any update on Ascent's review of PCWA's comments?

Thank you,  
Brian

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**From:** Brian Rickards

**Sent:** Friday, February 01, 2019 9:18 AM

**To:** 'Vance Jones' <[vjones@msce.com](mailto:vjones@msce.com)>; Michele Kingsbury <[MKingsbu@placer.ca.gov](mailto:MKingsbu@placer.ca.gov)>

**Cc:** Crystal Jacobsen ([cjacobse@placer.ca.gov](mailto:cjacobse@placer.ca.gov)) <[cjacobse@placer.ca.gov](mailto:cjacobse@placer.ca.gov)>; Tony Firenzi <[tfirenzi@pcwa.net](mailto:tfirenzi@pcwa.net)>; Heather Trejo <[htrejo@pcwa.net](mailto:htrejo@pcwa.net)>; Brent Smith <[BSmith@pcwa.net](mailto:BSmith@pcwa.net)>

**Subject:** RE: Placer Ranch meeting follow up

Vance and Michele,

Thanks for your time this morning to talk through some of PCWA's comments. Based on our discussion, County staff will speak with Ascent to verify if comments were addressed in other locations and how some of these could be addressed. Michele, please let me know the conclusion of your discussion with Ascent. PCWA will finalize the comment letter within the next two weeks.

Vance, as discussed, you will give me a call next week to discuss some of the comments related to the Specific and Area Plan.

Thank you,

**Brian Rickards, PE** | Associate Engineer | Technical Services Department, Engineering Division  
Placer County Water Agency | [www.pcwa.net](http://www.pcwa.net) | 144 Ferguson Road | Auburn, CA 95603  
Company (530) 823-4886 | Direct (530) 823-4845 | Cell (530) 863-3246 | [brickards@pcwa.net](mailto:brickards@pcwa.net)

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**From:** Vance Jones [<mailto:vjones@msce.com>]  
**Sent:** Wednesday, January 30, 2019 11:46 AM  
**To:** Michele Kingsbury <[MKingsbu@placer.ca.gov](mailto:MKingsbu@placer.ca.gov)>; Brian Rickards <[brickards@pcwa.net](mailto:brickards@pcwa.net)>  
**Subject:** RE: Placer Ranch meeting follow up

Folks, I'm open tomorrow or Friday morning. If one of those time slots work, please just send me a meeting invite for a call.

Thanks,

**Vance Jones**  
**MacKay & Soms Civil Engineers, Inc.** | 1552 Eureka Road, Suite 100 |  
Roseville, CA 95661 | P: 916.773.1189 | F: 916.773.2595 | E: [vjones@msce.com](mailto:vjones@msce.com) | W:  
[www.msce.com](http://www.msce.com)  
<image001.jpg>

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**From:** Michele Kingsbury <[MKingsbu@placer.ca.gov](mailto:MKingsbu@placer.ca.gov)>  
**Sent:** Wednesday, January 30, 2019 9:55 AM  
**To:** Brian Rickards <[brickards@pcwa.net](mailto:brickards@pcwa.net)>; Vance Jones <[vjones@msce.com](mailto:vjones@msce.com)>  
**Subject:** RE: Placer Ranch meeting follow up

I can make Friday at 8 am if you both can. I assume just a phone call.

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**From:** Brian Rickards [<mailto:brickards@pcwa.net>]  
**Sent:** Wednesday, January 30, 2019 9:04 AM  
**To:** 'Vance Jones'  
**Cc:** Michele Kingsbury  
**Subject:** RE: Placer Ranch meeting follow up

Good Morning Vance,

I am reviewing the Sunset Area Plan/Placer Ranch Specific Plan dEIR and had to go back to our discussions during the Monday, September 10<sup>th</sup> meeting at the Domes. I was hoping to understand clearly how the PRS fee parcel was addressed as well as the Placer Parkway Pipeline from SR-65 to eastern edge of PRSP. Per the meeting, this EIR was going to address both of these items. Do you have time to discuss a few things with me this week. I am available at the following times:

1. Today 2:30-3:30,
2. Tomorrow after 9:30
3. Friday 7-9:00 am

Thank you,

**Brian Rickards, PE** | Associate Engineer | Technical Services Department, Engineering Division  
Placer County Water Agency | [www.pcwa.net](http://www.pcwa.net) | 144 Ferguson Road | Auburn, CA 95603  
Company (530) 823-4886 | Direct (530) 823-4845 | Cell (530) 863-3246 | [brickards@pcwa.net](mailto:brickards@pcwa.net)

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**From:** Vance Jones [<mailto:vjones@msce.com>]  
**Sent:** Tuesday, September 11, 2018 2:12 PM  
**To:** Brian Rickards <[brickards@pcwa.net](mailto:brickards@pcwa.net)>

**Cc:** Michele Kingsbury ([MKingsbu@placer.ca.gov](mailto:MKingsbu@placer.ca.gov)) <[MKingsbu@placer.ca.gov](mailto:MKingsbu@placer.ca.gov)>

**Subject:** RE: Placer Ranch meeting follow up

Brian- Thanks for following up with this information. ...and very good to meet you yesterday, as well. Couple things:

Regarding the easement for the 42" line, the draft LLTM provides a 25' wide easement along the eastern edge of Parcel PR-87 (previously PR-85), so we'll upsize that to 35'. Easy fix.

For the PRS, I've got a couple ideas that I'd like to bounce off of our team. Thanks for the additional information and parameters, as that will help us tremendously. I'll circle back with you to discuss an approach before we revise any maps or exhibits.

Finally, the updated land use plan is attached for your use – two versions. The larger file plots 36x55 and is at 400-scale. The smaller file prints 11x17 and includes a summary table. The current plan is dated April 20, 2018, so please be sure that this is the version that everyone's using as we move forward.

Thanks,

**Vance Jones**

**MacKay & Soms Civil Engineers, Inc.** | 1552 Eureka Road, Suite 100 |  
Roseville, CA 95661 | P: 916.773.1189 | F: 916.773.2595 | E: [vjones@msce.com](mailto:vjones@msce.com) | W:  
[www.msce.com](http://www.msce.com)  
<image002.jpg>

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**From:** Brian Rickards <[brickards@pcwa.net](mailto:brickards@pcwa.net)>

**Sent:** Monday, September 10, 2018 12:15 PM

**To:** Vance Jones <[vjones@msce.com](mailto:vjones@msce.com)>; 'Colleen Karbowski' <[ckarbowski@westyost.com](mailto:ckarbowski@westyost.com)>

**Cc:** Michele Kingsbury - Placer County ([mkingsbu@placer.ca.gov](mailto:mkingsbu@placer.ca.gov)) <[mkingsbu@placer.ca.gov](mailto:mkingsbu@placer.ca.gov)>; Heather Trejo <[htrejo@pcwa.net](mailto:htrejo@pcwa.net)>; Tony Firenzi <[tfirenzi@pcwa.net](mailto:tfirenzi@pcwa.net)>; Jeremy Shepard <[jshepard@pcwa.net](mailto:jshepard@pcwa.net)>; Curtis Lam ([clam@hydroscience.com](mailto:clam@hydroscience.com)) <[clam@hydroscience.com](mailto:clam@hydroscience.com)>; Mark Sauer <[msauer@msce.com](mailto:msauer@msce.com)>; Brent Smith <[BSmith@pcwa.net](mailto:BSmith@pcwa.net)>; Jeff Apps <[JApps@placer.ca.gov](mailto:JApps@placer.ca.gov)>; LaRoy Jones Jr. <[ljones@pcwa.net](mailto:ljones@pcwa.net)>; Andy Hamilton <[ahamilton@pcwa.net](mailto:ahamilton@pcwa.net)>; Frank Helmick - West Yost

(<[fhelmick@westyost.com](mailto:fhelmick@westyost.com)>) <[fhelmick@westyost.com](mailto:fhelmick@westyost.com)>; Sandie Hewston <[shewston@pcwa.net](mailto:shewston@pcwa.net)>

**Subject:** Placer Ranch meeting follow up

Vance,

It was nice meeting you today. Below are my action items from today's Placer Ranch EIR meeting (and the Large Lot Final Map preparation).

1. **Width of the 42-inch pipeline easement:** 35 feet
2. **PRS (& future PS) size and location near Campus Park Blvd & Foothills:** See attached exhibit. PCWA will need up to 0.25 Acres (building footprint is approximated at 0.1 acres). The location is preferred to be as close as possible to the intersection to minimize PRVs or eliminate excessive parallel piping; however, we are okay with all of the alternatives. Foothill Blvd will be the delineation between the two pressure zones. *Note: all other Pressure reducing stations will likely not be in a large building and will still need vehicular access to, but is assumed to be within the Highway Easement or PUE.*

Feel free to call to discuss any questions you may have. Please forward me the revised Placer Ranch Land Use Plan when you get a chance.

Colleen,

Can you add a 24" stub to the North on the east side of Placer Ranch's boundary. Each stub, north and south, should be 10' east of the Placer Ranch property line.

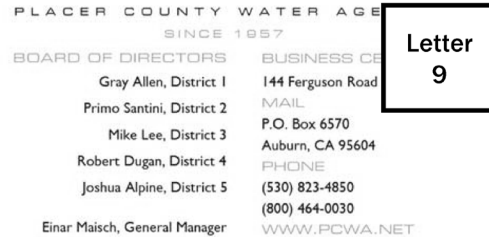
Thank you,

**Brian Rickards, PE** | Associate Engineer | Technical Services Department, Engineering Division  
Placer County Water Agency | [www.pcwa.net](http://www.pcwa.net) | 144 Ferguson Road | Auburn, CA 95603  
Company (530) 823-4886 | Direct (530) 823-4845 | Cell (530) 863-3246 | [brickards@pcwa.net](mailto:brickards@pcwa.net)

**Letter  
8**

Placer County Water Agency  
Brian Rickards, P.E., Associate Engineer  
September 10, 2018; January 30, 2019; February 1, 2019; February 13, 2019; and  
February 15, 2019

- 8-1 The comment states that PCWA will update its comment letter dated January 31, 2019 (comment letter 7) to include language that came from discussions between County staff, project engineers, and PCWA. The updated comment letter is included as comment letter 9, below.



February 22, 2019

File No. Planning

sent via email

[cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov)

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

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

To whom it may concern:

In review of the subject documents, Placer County Water Agency (PCWA) offers the following  
comments:

**Draft Environmental Impact Report Comments:**

**03-Project Description**

1. Per a meeting held on September 10, 2018, County staff agreed to include in this EIR the 42-inch pipeline from Highway 65 to the eastern boundary of Placer Ranch. It appears that this document excludes pipelines outside of the Placer Ranch Specific Plan (PRSP). Exhibit 3-3, 3-19, 3-24 and page 3-66 does not provide indisputable proof that the pipeline is covered within this document.
2. Exhibit 3-3 shows PCWA pipeline alignment within Placer Parkway; however, the pipeline will be a transmission main through PRSP, as shown in Exhibit 3-19. The 42-inch pipeline should be included within this EIR, currently areas east of PRSP appear to not be included.
3. Exhibit 3-19 should show Sunset Area Point of Connection (POC) on the west side, near the terminus. Please label all PCWA connections as "POCs" and all connections with other water purveyors as "interties."
4. Page 3-26 and Exhibit 3-3 should show offsite recycled water pipeline extension and include that extension in this EIR.
5. This project is building a pressure reducing station at Campus Park Boulevard and Foothills Boulevard. This site should also include a possible future pump station. Please include discussion of a parcel for this infrastructure and modify language to get project level clearance for California Environmental Quality Act (CEQA) moving forward. This site would be granted to PCWA in fee. Criteria was discussed for this parcel and requirements were given at a meeting between PCWA and County staff on September 10, 2018.
6. There is no agreement in place for PCWA being the recycled water purveyor. Although anticipated, please revise areas where PCWA is listed as the recycled water purveyor to describe this as the intended, but not absolute outcome. Example: Page 3-53, "The City of Roseville

9-1



provides wholesale recycled water to PCWA, which would serve as the recycle water retailer for the PRSP area.”

7. Exhibit 3-24: The Placer Parkway pipeline does not appear to be covered by this EIR according to this map. Please provide additional clarity to ensure water line is covered in this document.
8. Page 3-66: Construction of the 42-inch pipeline west of the connection at Highway 65 may be constructed by PCWA or deferred to be constructed with and by the PRSP. This EIR should cover this entire pipeline from the tie-in at Highway 65 westward.

9-1  
cont.

#### 4.15 Utilities

1. Potable Water Master Plan and Recycled Water Master Plan, Appendix F and G respectively, are dated May 2017; however, the report and PCWA approved documents are dated July 18, 2017.
2. Provide a figure or narrative delineating the separation of the utilities within the roadway, ensuring Title 22 requirements are met.
3. Page 4.15-4: PCWA has deferred the first phase of the Ophir Water Treatment Plant (WTP) past 2019, until demand warrants new treatment capacity. We suggest rewording sentence to “The Ophir WTP has not yet been constructed, and timing is generally dependent on anticipated need. Plans to begin construction on the first phase of the Ophir WTP and associated conveyance pipelines, would provide treatment capacity of 10 mgd.” Note, the design and permitting have been completed and construction will begin upon anticipated demand.
4. Page 4.15-19: Water Conservation: Senate Bill 606 (SB 606) and Assembly Bill 1668 (AB 1668) have been passed since the completion of the water master plans. These conservation measures authorize further water efficiency measures beyond Senate Bill x7-7, moving away from a comprehensive GPCD target. Even though water efficiency standards have not been fully established, this project should acknowledge this legislation.
5. Page 4.15-24, Policy 4.C.1: Per the Potable Water Master Plan, “It is the intent of [the project] that two groundwater wells at either Parcels PR-93, PR-96 PR-97 would each have a projected capacity of 1.0 million gallons per day (MGD), or approximately 695 gallons per minute (GPM), and groundwater is of such quality that only disinfection will be required to meet California Drinking Water Quality Standards. If the available capacity or water quality does not achieve these objectives, the Developer shall, at its own cost, work with PCWA to relocate the well site within the Project to an alternate mutually agreeable site until these objectives are satisfied.” Furthermore, the developer shall conduct a groundwater study on the sub-basin’s water quality, with emphasis on how the basin may be affected by new domestic wells in proximity to the landfill. Policy 4.C.1 partially addresses the comment, but more is needed, including, but not limited to: burdened cost, additional sites, landfill impacts, etc.
6. Parcel PR-97, for the recycled water tank, pump station and well, went from 2.14 acres to 1.09 acres in the revised land use plan; however, no site plan was submitted to the Agency for approval. A site plan shall be submitted to confirm adequacy of property. With screening requirements of the infrastructure, the existing site may not be adequate. For tank and pump station locations, suggest screening to occur offsite where feasible – adjacent to park or open space areas.
7. Exhibit 4.15-1: Update the existing water distribution map with current infrastructure. This infrastructure appears to be approximately 3 years old and several distribution mains appear to be not represented within this map. Distribution maps can be obtained by contacting [brickards@pcwa.net](mailto:brickards@pcwa.net).
8. Page 4.15-40: “The Foothill WTP and Sunset WTP have approximately 1.8 MGD of capacity (as of January 2019) remaining” This document states 2.5 MGD, which is approximately 2 years old.

9-2

Page 2 of 4

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9. Page 4.15-40: Note that the 5.16 million gallon potable water storage tank will be co-located with a pump station and a lay-down yard for supplies.

9-2  
cont.

In addition to the review of the draft EIR, PCWA offers the following edits of the Sunset Area Plan and the Placer Ranch Specific Plan.

**Placer Ranch Specific Plan Comments:**

1. The treated water tank site should mention a pump station, an adjacent building, and lay down area for storage of parts and equipment.
  2. PCWA should be listed as the potable water purveyor for the region with specific reference to PCWA's standards regarding water supply, storage, and distribution system infrastructure. Design standards for recycled water should be per the recycled water purveyor.
- Section 9 Utilities
    - Page 09-2
      - Add "of acceptable water quality" to the requirements of the wells within the Water Supply & Demand paragraph
      - Add "corridor, PR-87" after "via the Placer Parkway" in bottom-right paragraph and delete "roadway corridors"
    - Page 09-4
      - Reword the recycled water retailer to "PCWA or Placer County" in bottom-right paragraph. Improvements are to be constructed to retailer's standard.
      - Wells are to be constructed to PCWA's standard, not Placer County.
      - PCWA is misspelled in second paragraph.
  - Section 10 Implementation
    - Page 10-6
      - Revise entry of Maintenance Funding under Water Infrastructure row in Table 10-1 from "User Fees" to "PCWA fees"; also, add Table 10-1 to Table of Contents. See next comment.
      - Add Placer County Water Agency as a potential recycled water provider, current listing shows Placer County. Maintenance Funding of water and recycled water infrastructure should be the same.
    - Page 10-7
      - Clarification on Public Agency Impact Fees paragraph: PCWA is not part of the building permit process and building permits can be pulled without connection charges assessed. PCWA does require a developer to enter into a Facilities Agreement for funding and installation of facilities which can happen after issuance of a building permit. We suggest rewording to "The fee structure requires the payment of fees prior to issuance, or finalization, of a building permit."
      - Other Maintenance Funding options listed in Table 10-1 should be described in maintenance funding options description (e.g., User Fee and Property Tax).
  - Development Standards Section 5 Public Facilities
    - Page 05-4
      - General Notes
        - If the available capacity or water quality of the groundwater does not achieve PCWA standards, the developer shall work with PCWA to

9-3

relocate well site within Project to an alternate mutually agreeable site such that objectives are satisfied.

- Developer shall conduct groundwater study on the sub-basin's water quality, with emphasis on how the basin may be affected by new domestic wells in proximity to landfill
  - Replace "Placer County standards" with "all applicable codes" in the first requirement of Potable Water Facilities
  - Revise second requirement to say "per the requirements of the Placer County Code, Division of Drinking Water, and PCWA requirements."
  - Revise fourth requirement to state "Groundwater wells, the PRV station at Foothills and Campus Park, and pumping stations..."
- Page 05-5
  - The recycled water purveyor will likely be PCWA or Placer County; therefore, we suggest standards for the recycled water infrastructure shall be per the purveyor. PCWA will be the treated water purveyor and shall be constructed per PCWA standards.
- Design Guidelines Section 2 Landscape Architecture
  - Page 02-10
    - In general, pipelines should be within paved areas. Where select pipelines are within landscape corridors, trees and shrubs shall be prohibited within 10 feet of any water main

9-3  
cont.

**Sunset Area Plan Comments:**

- Part II Section 9 Implementation
  - 9-5 Infrastructure Finance #5
    - Note that portions of the Sunset Area is within the City of Lincoln's Sphere of Influence (specifically the Urban Reserve). Lincoln is a retailer for all areas within the City's boundary.

If you have any questions or require additional information, please contact me at (530) 823-4845.

Sincerely,



Brian Rickards, P.E.  
Associate Engineer  
[brickards@pcwa.net](mailto:brickards@pcwa.net)

BR:TF:sw

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<b>Letter</b> <b>9</b>	Placer County Water Agency Brian Rickards, P.E., Associate Engineer February 22, 2019
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This comment letter is virtually the same as the content of comment letter 7. Therefore, the responses simply cross-reference to responses to this letter.

- 9-1 See responses to comments 7-1 through 7-6.
- 9-2 See responses to comments 7-7 through 7-15.
- 9-3 See responses to comments 7-16 through 7-18.

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T: 916.468.0576  
Robin@churchwellwhite.com**Letter  
10**

February 22, 2019

VIA U.S. MAIL &amp; EMAIL (cdraecs@placer.ca.gov)

Shirlee Herrington  
Environmental Coordination Services  
Community Development Resource Agency  
County of Placer  
3091 County Center Drive, Suite 190  
Auburn, CA 95603**Re: Sunset Area Plan/Placer Ranch Specific Plan Draft EIR  
(State Clearinghouse No. 2016112012)**

Dear Ms. Herrington:

Churchwell White LLP represents Western Placer Waste Management Authority (the "Authority") in connection with its review of the Sunset Area Plan/Placer Ranch Specific Plan (the "Project"). This letter provides the Authority's comments to the draft environmental impact report for the Project (the "Draft EIR"). In addition, attached to this letter is a technical report from environmental consultants who are deeply familiar with operations at the Western Regional Sanitary Landfill ("WRSL"), as their previous work is cited and referenced in Appendix J to the Draft EIR.

As you know, the WRSL is located in the center of the Sunset Area Plan ("SAP"), adjacent to the northern boundary of the Placer Ranch Specific Plan ("PRSP"). The Project, as currently proposed, would replace the existing landfill buffer, which currently prohibits any residential development within one mile of the WRSL site, with a new buffer that would allow residential development up to 1,000 feet from the perimeter of active landfill and recycling operations. The Project could also potentially allow commercial and recreational uses to encroach within the buffer zones of 1,000 feet and 500 feet, respectively.

In December 2016, the Authority submitted comments in response to the Notice of Preparation for the Draft EIR ("NOP"). The Authority's NOP comments detailed the critical importance of the WRSL site and the existing buffer zone, along with policies for adopting mitigation measures that Placer County (the "County") should consider as the lead agency for the Project. While the Authority appreciates its ongoing discussions with the County, the Authority has concerns that the Draft EIR does not adequately analyze the reduced buffer zone. In addition, the Draft EIR does not incorporate feasible

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mitigation measures, as required under CEQA, to reduce the reasonably foreseeable air quality and other impacts related to the reduced buffer zone and the proposed encroachment of development in close proximity to the WRS�.

If the landfill buffer must be reduced, the attached technical report shows that mitigation measures are available that would likely reduce potential odor impacts at the PRSP to a less-than-significant level. CEQA therefore requires the County to incorporate odor-reducing mitigation measures into the Draft EIR, especially given that the reduced landfill buffer is the central feature of the Project that would directly cause a significant increase in odor impacts if additional measures are not implemented.

10-1  
cont.

**1. The proposed buffer zone policy is internally inconsistent with the General Plan.**

The Placer County General Plan was last updated by the County Board of Supervisors on May 21, 2013 (the “General Plan”). Under State law, the General Plan must include an integrated, internally consistent, and compatible statement of policies.<sup>1</sup> When elements of a general plan are found to be internally inconsistent, on judicial review, “the appropriate remedy is to issue a writ of mandate requiring a county’s board of supervisors to set aside the inconsistent elements so that they can be amended to achieve the statutorily required correlation and consistency.”<sup>2</sup> In addition, under CEQA, the Draft EIR must disclose if the Project is inconsistent with any applicable land use plan, policy, or mandatory provision in the General Plan.<sup>3</sup>

The Project proposes to develop residential, commercial and recreational uses within the existing and proposed landfill buffer zones, along with General Plan amendments that, if adopted, would result in an internal, irreconcilable inconsistency with the following mandatory provision in the General Plan:

10-2

**BUFFER ZONE PRESERVATION**

Land use buffer zones shall be reserved and guaranteed in perpetuity through land acquisition, purchase of development rights, conservation easements, deed restrictions, or similar mechanisms, with adjacent proposed development projects providing the necessary funding.<sup>4</sup>

Both the PRSP and SAP would authorize commercial, recreational and residential development within the existing and proposed landfill buffer zones. The Draft EIR Project Description, however, makes no reference to this conservation requirement.

<sup>1</sup> Cal. Gov. Code § 65300.5.

<sup>2</sup> *Murrieta Valley Unified School Dist. v. County of Riverside* (1991) 228 Cal.App.3d 1212, 1235.

<sup>3</sup> 14 Cal. Code Reg. § 15125; Placer County Environmental Checklist.

<sup>4</sup> Placer County General Plan, Part 1, Land Use/Circulation Diagrams and Standards p. 24.

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Although the Draft EIR refers to agricultural and open space easements in Chapter 4.10 (Land Use) and public trail easements in Chapter 4.13 (Public Services), it makes no reference to the landfill buffer conservation easement requirement, or that adjacent development projects, such as PRSP, must bear the cost of acquiring such easements.

In addition, the Draft EIR does not discuss how the proposed General Plan amendments to further reduce the residential landfill buffer zone from 2,000 to 1,000, or to further reduce the commercial and recreational buffers to less than 1,000 and 500 feet, should be reconciled with the General Plan's mandatory provision to permanently conserve all land within the buffer zone.

The County's existing landfill buffer policy culminated after the result of a lengthy, multiyear General Plan update throughout the 1990's. The conservation easement requirement clearly represents a General Plan policy "adopted for the purpose of avoiding or mitigating an environmental effect."<sup>5</sup> If the County's intent now is to transition from a conservation policy to a development model within the landfill buffer, this change in policy must be thoroughly analyzed in the Draft EIR. The baseline condition requiring the acquisition of conservation easements must be disclosed and analyzed, impacts related to the removal of the conservation requirement must be identified, and additional or functionally equivalent mitigation measures necessary to reduce future land use conflicts with the WRSL must be implemented.

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cont.

The Authority is willing to discuss functionally equivalent mitigation measures that could preclude the need for conservation easements, provided that such measures include an ongoing enforcement mechanism, similar to an easement in perpetuity. Examples of ongoing mitigation measures are provided in the technical report. In addition, durable finance mechanisms must be adopted to ensure that mitigation measures can be implemented in an incremental, ongoing basis throughout the 80-year buildout scenario contemplated in the Draft EIR. Further refinements to the mitigation measures in the Draft EIR are clearly needed, depending on the County's proposed resolution of the conservation requirement.

Lastly, to fully ensure General Plan consistency, the County should closely review the requirements set forth in Part III (General Standards for Consideration of Future Amendments to the General Plan). Part III includes other mandatory considerations related to the existing landfill buffer zone and other provisions that must be reconciled with the proposed General Plan amendments for the Project.

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<sup>5</sup> Placer County Environmental Checklist.

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**2. Solid waste generated by the proposed Project may exceed operational capacities at the WRSL.**

Chapter 4.15 of the Draft EIR (Utilities) examines waste management operations at the WRSL. The Environmental Setting in Section 4.15.2 briefly discusses the key components of the WRSL, such as the Materials Recovery Facility (MRF), which includes separate processing of construction and demolition waste, and green waste. The Environmental Setting also briefly describes composting and landfill operations at the WRSL, in addition to the Permanent Household Hazardous Waste Collection Facility.

In the analysis of Impacts and Mitigation Measures, however, Chapter 4.15 examines the capacity of the landfill area only, and does not analyze the individual components that comprise the WRSL site, which were clearly identified in the previous section. On closer review of the MRF, for example, the construction, demolition and green waste operations are currently near their maximum operating capacities. Implementation of the Project could therefore exceed the ability of the WRSL and MRF to adequately process construction, demolition and green waste. As a result, the Draft EIR incorrectly concludes that “[t]he MRF and the WRSL have adequate capacity for disposal of solid waste generated by construction and operation of the PRSP.”<sup>6</sup> Implementation of the Project will in fact result in potentially significant impacts to the operational capacity of the MRF, and additional mitigation measures are necessary to address this impact.

Although the Draft EIR notes that the Authority is currently proceeding with a master planning process to improve and increase operations at the site, these expansion plans remain highly conceptual and are not yet complete. In addition, even if the master planning process had concluded, the Project must address actual capacity limitations and implement measures to address impacts related to the Project, such as the generation of construction and demolition waste, and green waste, that could potentially exceed the current operational limits at the WRSL.

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**3. The Draft EIR must include mitigation measures to finance the facilities, services and personnel that would be required to reduce odors at the WRSL**

The Draft EIR finds that the “cumulative demand for solid waste services would be a potentially significant impact.”<sup>7</sup> In addressing this potential impact, however, the Draft EIR states that the PRSP and SAP would be “required by Placer County General Plan Policies 4.B.1 and 4.B.2 to pay their fair share of the cost of all existing public facilities and the cost of upgrading existing [solid waste processing] facilities or constructing new facilities that would be needed to serve the new development,” and that “[t]hese

10-4

<sup>6</sup> Draft EIR, p. 4.15-57.

<sup>7</sup> Draft EIR, p. 4.15-69.

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policies would serve to avoid any project contribution to significant adverse effects related to solid waste disposal. The impact would be less than significant.”<sup>8</sup>

The Draft EIR, however, does not specifically identify how the Project would contribute fair share fees to contribute towards the new facilities, operations and personnel that would be needed at the WRSL. In addition, additional contributions are needed so that the Authority can implement additional measures to reduce odors, especially where such measures would not otherwise be needed, but for the reduced landfill buffer. Moreover, tipping fees by themselves may be insufficient to generate sufficient revenue over the long term to address the level of odor reduction that may be needed to ensure that future land use conflicts are avoided if the existing landfill buffer is reduced.<sup>9</sup> In addition, where the need for additional odor reductions are needed directly as a result of development of the PRSP within the landfill buffer, the costs for addressing those impacts should not be spread to all WRSL customers through generally applicable tipping fees.

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cont.

Throughout other sections of the Draft EIR, mitigation measures are proposed to require the payment of fair share fees, and the creation of special taxes and assessments to fund additional facilities, maintenance and personnel costs that will be required as a result of the buildout of the Project.<sup>10</sup> In addition, the Draft EIR includes mitigation measures regarding transportation improvements and the Pleasant Grove Retention Facility, both of which are offsite to the Project. Similar mitigation measures must be implemented to address the new facilities, operational adjustments, and new personnel that will be required at the WRSL to address potential odor impacts directly caused by the development and buildout of the Project within the existing landfill buffer.

**4. The Draft EIR’s analysis in Impact 4.3-6 is inconsistent with the odor analyses in Appendix J and must be revised.**

The Draft EIR’s analysis of odor impacts raises several concerns that must be corrected prior to the County taking any action to certify the EIR or approve the Project.

Under Impact 4.3-6, the Draft EIR asserts that “odor impacts are subjective and there are no quantifiable thresholds of significance....” Appendix J to the Draft EIR, however, clearly states an established threshold of significance using the dilutions to threshold (“DT”) metric:

10-5

Generally, odor is frequently considered likely to be offensive when it exceeds 10 DT, may be considered offensive when it exceeds 8 DT, and is

<sup>8</sup> *Id.*

<sup>9</sup> See, e.g., Landfill Tipping Fees in California, CalRecycle February 2015

<sup>10</sup> See, e.g., Mitigation Measures 4.13-1a, 4.13-2, 4.13-4, 4.13-8,

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sometimes considered offensive when it exceeds 5 DT. These thresholds are sometimes used as regulatory odor nuisance thresholds and are illustrative of the range of odor concentrations that are considered a nuisance.<sup>11</sup>

Appendix J therefore provides a quantifiable metric with regard to odor impacts that the Draft EIR should incorporate as its significance threshold for odors.

Moreover, the Draft EIR mistakenly relies on unrelated holdings by the First District Court of Appeal,<sup>12</sup> regarding Receptor Thresholds, to conclude that the Draft EIR is “not strictly required” to evaluate impacts of existing odor sources such as WRSL. The WRSL Incremental Odor Evaluation in Appendix J clearly demonstrates that the Project would exacerbate existing odors generated by the WRSL if additional mitigation measures are not implemented. In addition, odor impacts are directly relevant in this case because the General Plan amendment for the Project proposes to reduce the landfill buffer zone to allow residential, commercial and recreational uses to encroach closer to the WRSL. Reduction of the buffer zone therefore serves as the key Project feature that would potentially expose future residents to odors, and buildout of the Project would generally lead to the production of more waste that would also serve to exacerbate the potential for future odor impacts from the WRSL.

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cont.

Appendix J analyzes existing, baseline odors, baseline odors plus the Project, and future odors plus the Project, to determine the incremental impact of Project-related odors. Appendix J then concludes that the odor intensity and footprint of the WRSL site will continue to increase, and that the solid waste generated by the Project will play a significant role in contributing to that increase. The Draft EIR, however, ignores the analysis in Appendix J and concludes that “neither Placer County nor PCAPCD has adopted nor subscribes to any specific scheme of odor standards or thresholds.”<sup>13</sup>

Ultimately, Appendix J constitutes substantial evidence of a significant odor impact that would be caused directly by the Project’s proposed removal of the landfill buffer zone, and the Project’s incremental contribution of solid waste disposal at the WRSL.

Whether or not the County applies a quantitative or qualitative significance threshold with regard to odors, the Draft EIR concludes that odor impacts resulting from implementation of the Project would be significant. Despite this significance finding, however, the Draft EIR proposes no mitigation measures to reduce potential odor impacts. On the other hand, the Draft EIR explains that the County rejected a proposal

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<sup>11</sup> Draft EIR, Appendix J, WRSL Incremental Odor Evaluation, p. 6

<sup>12</sup> *California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2016) 2 Cal.App. 5th 1067

<sup>13</sup> Draft EIR, p. 4.3-50.

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to adopt a regional mitigation fee to address improvements at the WRSL site that would reduce odor impacts.<sup>14</sup>

Again, the failure to implement feasible mitigation measures pursuant to Impact 4.3-6 is somewhat baffling, given that the proposed reduction of the landfill buffer zone is a key component for allowing the proposed buildout of the PRSP. Although the Authority is proactively evaluating site improvements at the WRSL to reduce odors, the reduced buffer zone will undoubtedly require the Authority to take additional measures, with additional costs, that would not need to be incurred except due to the development of PRSP and SAP within the existing buffer zones.

As noted above, the Draft EIR references the County's General Plan policy requiring new developments to pay their fair share for the cost of new facilities and services. Impact 4.3-6 therefore must include enforceable mitigation measures to ensure that fair share contributions are provided through the development of the PRSP and SAP, especially where the need for new services, facilities and personnel is directly caused by the reduced landfill buffer zone. Those costs should not be borne by the Authority, nor its Member Agencies or existing ratepayers.

**5. The Draft EIR's analysis in Impact 4.15-11 must be revised to include enforceable mitigation measures, to reduce potential odor impacts that will be directly caused by the reduced landfill buffer zone.**

Under CEQA, the County clearly has the authority to adopt measures requiring the developer and future properties within the SAP or PRSP to mitigate odors at the WRSL, provided that such measures are proportional to the impacts caused by the Project.<sup>15</sup>

Under Impact 4.15-11, the Draft EIR finds that the reduced landfill buffer zone will lead to increased complaints regarding the WRSL if additional measures are not taken to reduce odors. Rather than identify mitigation measures to address this impact, however, the Draft EIR states that the Authority is proactively engaged in community outreach, and taking measures to reduce odors from the WRSL. In reciting all of the current actions taken by the Authority to reduce potential odor impacts, the Draft EIR ignores the implementation of mitigation measures to address potential future land use conflicts due to the reduced landfill buffer zone.

The Authority will undoubtedly be required to greatly accelerate its current outreach and odor management operations in order to adjust to residential, commercial and recreational encroachment proposed by the PRSP and SAP. The Draft EIR concludes, however, without any substantial evidence, that the potential risks to expansion of the WRSL due to the reduced buffer zone are speculative. On the contrary, landfill

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10-6

<sup>14</sup> Draft EIR, p. 4.3-51.

<sup>15</sup> 14 Cal. Code Reg. § 15126.4.

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expansions have constantly been the target of litigation, regardless of the investments made by those agencies, or their importance as assets to the community. Bringing additional residents closer to the landfill buffer will significantly increase the risk of additional lawsuits, especially if the Project does not contribute to suitable measures to reduce odors at the WRSL.

Even with the execution of landowner notices, implementation of the Project will require the Authority to introduce additional odor control measures that would not otherwise be needed if the existing landfill buffer zone remained in place. Existing customers should not be required to incur costs related to new development that is encroaching onto the existing landfill buffer zone.

**6. Numerous mitigation measures are available to reduce odor impacts and operational deficiencies at the WRSL caused by the Project.**

Mitigation Measure 4.10-2 in the Draft EIR identifies some basic measures for mitigating odor impacts for the properties located within the PRSP and SAP. Building design, landscaping buffers and deed notifications are important elements that should remain as mitigation measures for the Project. Downstream measures to reduce potential odor impacts, however, are far less effective than source controls at the WRSL, which would achieve much greater odor reductions. Mitigation measures must be implemented to require the PRSP and SAP to contribute to operational and facility improvements at the WRSL, in order for the County to justify any reduction to the existing landfill buffer.

In Appendix J, SCS Engineers provides a Review of Odor Management at the WRSL, which expressly finds that additional mitigation measures should be implemented at the WRSL to reduce potential odor impacts, thereby reducing future land use conflicts. For example, the SCS report identifies gas flaring improvements, expanded use of misters, the use of additional covers and other improvements that would reduce odors at the WRSL. Appendix J is based in part on a literature review, including the 2015 EMC report prepared by the CE Schmidt and TR Card, who have prepared the attached technical report.

The attached technical report reviews potential mitigation measures proposed in Appendix J, and the report suggests a broader array of measures for reducing odors at the WRSL. Potential mitigation measures identified by SCS Engineers, and elaborated by the attached report, include the following:

- Improved use of gas flaring and engines;
- Development of an automated gas system to respond to changes in barometric pressure and optimized gas recovery;

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cont.

10-7

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- Improvements to landfill cover and use of temporary membrane landfill covers;
- Ongoing system-wide assessments;
- Greater use of odor reducing agents;
- Development of a biosolids and wood waste processing facility;
- Incorporation of odor masking agents during the use of misters;
- Improvements to, and scaling up of, aerated static pile composting;
- General odor controls, such as tree lines, meteorological monitoring, odor monitoring on the PRSP and SAP sites; and
- Dedicating Authority personnel to ongoing odor inspection, management and supervision.

The report concludes that effective odor reduction mitigation strategies can be implemented on the WRSL site to achieve an odor emission reduction of around 80%. If such reductions were achieved, the reduced landfill buffer would cause far less odor impacts. Odor episodes would be less frequent, with shorter duration, and with lower concentration or drift to offsite areas of the WRSL.

Based on the attached report, an 80% reduction of the existing odor profile at the WRSL is possible, using known techniques. Over time, additional measures will likely emerge to further control and reduce odors at the WRSL. Under either a qualitative or quantitative approach to analyzing odor impacts, measures to reduce odors must be implemented as enforceable mitigation measures for the Project, in-lieu of the existing requirement in the General Plan to permanently conserve all land within the landfill buffer zone.

Additional air dispersion modeling would help to refine the quantitative (or qualitative) reduction that additional mitigation measures could provide to reduce odors from the WRSL. Those additional mitigation measures must be implemented if the modeling shows that their implementation would significantly reduce the DT level or hedonic tone, especially in the areas proposed for development within the reduced landfill buffer zone. In addition, measures must be implemented to allocate the fair share of those costs to the Project. The Authority looks forward to working with the County in

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cont.

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this modeling, to identify the most cost-effective measures for the Draft EIR to implement.

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cont.

**7. The Draft EIR must examine alternatives to the proposed landfill buffer.**

The reduced landfill buffer is a key component of the PRSP, as currently envisioned. Several commenters to the NOP raised concerns regarding the proposed reduction of the landfill buffer. The Draft EIR therefore should have analyzed a Project alternative in which the landfill buffer zone remained in place, with development intensities revised to account for the existing landfill buffer.

10-8

**8. The Draft EIR should analyze alternative alignments for water and recycled water lines.**

Figure 4.15-4 in the Draft EIR identifies a new 12-inch potable water pipeline extending through the center of the Authority's property located directly to the east of the WRSL. In addition, Figure 7 in Appendix B to the Draft EIR identifies an 8-inch recycled water pipeline extending along this same alignment. The Authority is currently developing a master plan that could entail the placement of a new landfill on the parcel to the east of the WRSL. The placement of pipelines through the Authority's property therefore may be infeasible. Alternative pipeline alignments that do not cut through the Authority's property should be considered in the Final EIR.

In conclusion, the purpose of this letter is to identify areas where the Draft EIR should be revised in accordance with CEQA and, more importantly, to address additional measures that the Draft EIR must implement, as required under CEQA, to mitigate the direct impacts that would result from the reduction of the existing landfill buffer.

10-9

Although the Authority has additional concerns regarding other aspects of the Project, this letter focuses on the proposed landfill buffer as the key issue that threatens the long-term viability of the WRSL. If warranted, the Authority may submit additional comments regarding other aspects of the Project at a later date.

Lastly, résumés for CE Schmidt and TR Card are provided for reference, to illustrate their extensive background in air quality impacts relative to landfills and project siting; the Authority does not intend for the County to provide any responses to those materials in the Final EIR.

Sincerely,

Churchwell **White** LLP



Robin R. Baral

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<b>Letter 10</b>	Western Placer Waste Management Authority Robin R. Baral, Churchwell White LLP February 22, 2019
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- 10-1 The comment suggests that the Draft EIR does not appropriately analyze the reduction of the landfill buffer, and it states that mitigation measures are available to reduce odor impacts in the PRSP area to a less-than-significant level. See Master Response 4: Odors regarding the Draft EIR's discussion of odors, the landfill buffer, and mitigation measures.
- 10-2 The comment suggests that the project's proposal to amend the County's General Plan sanitary landfill buffer policy is inconsistent with the General Plan's provision related to buffer zone preservation.

The "Land Use Buffer Zone Standards" section on page 18 in the County's General Plan notes:

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

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

The comment's assertion that the project's proposal to modify the General Plan sanitary landfill buffer zone is inconsistent with the "Buffer Zone Preservation" provision contained within the Land Use Buffer Zone Standard section of the General Plan is incorrect. As outlined above, when applying buffer zone standards through project review, the first step is to assess what buffer applies to the project. Following that determination and application of the applicable buffer zone for a project, the relevant buffer zone standards and related provisions contained within the Land Use Buffer Zone Standard section of the General Plan are then required to be "reserved and guaranteed in perpetuity through land acquisitions, purchase of development rights, conservation easements, deed restrictions, or similar mechanisms, with adjacent proposed development projects providing the necessary funding." The purpose of this provision is to protect and memorialize the established buffer zone after it has been applied to a project. Therefore, the project's proposal to modify the sanitary landfill buffer zone is not inconsistent with this provision.

- 10-3 The comment states that the Draft EIR evaluated the capacity of the landfill only but that it did not evaluate the capacity of the various components. The comment states that the construction, demolition, and green waste operations are nearing maximum capacity and may not have adequate capacity to serve the project as concluded in the Draft EIR. The comment further states that while WPWMA is currently working on expansion plans, these plans are conceptual and not yet complete.

Analyses of impacts related to solid waste capacity do not typically break down the overall capacity of a facility into individual components of a facility. However, for purposes of clarity, additional information is being provided as part of this response. WPWMA's 2016 Transfer Processing Report (TPR) for the MRF provides some of the capacity data for the individual MRF components described by the comment. The TPR (page 8) states that the capacity of the MRF is comprised of the processing capacity (the ability to convey and sort through the waste and other materials) and the storage capacity (the physical ability of the plant to store materials prior to being processed). The

combined processing capacity of the construction and demolition, green and wood waste, and expanded composting areas of the MRF is 400 tons per day. The TPR outlines the typical quantities of materials received per day within these three categories: 185 tons of construction and demolition materials, 173 tons of green waste, and 8 tons of wood waste. Therefore, the facility currently receives 366 tons of these materials per typical day, which represents approximately 29 percent of the typical daily waste received by the MRF, and the MRF has 34 tons per day of available processing capacity for these categories of materials (CalRecycle 2016).

Regarding construction waste, the Draft EIR states that construction in the net SAP area would, after recycling and/or salvaging a minimum of 65 percent of construction waste, generate 115,895 cubic yards, or 66,225 tons (see Draft EIR, page 4.15-54). Spread across an 80-year buildout period, development in the net SAP area would generate 828 tons of construction waste per year, or 2.3 tons per day. Construction in the PRSP area would generate 43,886 tons of construction waste, which, spread across the PRSP's expected 20-year buildout period, would be 2,194 tons of construction waste per year, or 6 tons per day. Therefore, construction waste generated by development in the net SAP area and PRSP area would be 8.3 tons per day combined, which would represent less than a 5-percent increase in daily construction and demolition waste received at the MRF.

Operation of the project would generate green waste and wood waste. An estimated breakdown and total are provided in Table 3-7. As shown in Table 3-7, the project would generate approximately 10.1 tons of green waste and wood waste per day, which constitutes less than a 6-percent increase in daily green waste and wood waste received at the MRF.

**Table 3-7 Estimated Project-Generated Green Waste and Wood Waste<sup>1</sup>**

Land Use Type	Percent of MSW Stream	Net SAP Area (tons/day)	PRSP Area (tons/day)	Total (tons/day)
Residential <sup>2</sup>	5.5	1.1	2.8	3.9
Commercial <sup>3</sup>	9.3	3.04	2.2	5.2
Industrial <sup>5</sup>	1.0	0.7 <sup>6</sup>	–	0.7
University <sup>7</sup>	5.4	–	0.3	0.3
<b>Total</b>				<b>10.1</b>

<sup>1</sup> Includes Leaves and Grass, Prunings and Trimmings, and Branches and Stumps from CalRecycle's waste stream rate table for Placer County

<sup>2</sup> Uses CalRecycle's "Residential" waste stream rate tables

<sup>3</sup> Uses the "Services-Professional, Technical, and Financial" Business Group from CalRecycle's Commercial waste stream rate tables

<sup>4</sup> Includes SAP Categories General Commercial, EMU, and Business Park from Draft EIR Table 4.15-13

<sup>5</sup> Uses the "Manufacturing-All Other" Business Group from CalRecycle's Commercial waste stream rate tables

<sup>6</sup> Includes SAP Categories Innovation Center, Eco-Industrial, and Light Industrial from Draft EIR Table 4.15-13

<sup>7</sup> Uses the "Education" Business Group from CalRecycle's Commercial waste stream rate tables

Source: Compiled by Ascent from SAP/PRSP Draft EIR and CalRecycle 2019

The project's total combined construction and demolition waste, wood waste, and green waste would be 18.4 tons per day, which is approximately 54 percent of the 34 tons per day of available processing capacity for these categories of materials. Therefore, it appears that, even within these individual components of the MRF, there is adequate capacity to serve the project.

Unlike the landfill capacity discussion in the Draft EIR, processing capacity associated with the MRF is not based on a finite resource (such as the area of a landfill). Processing capacity can be increased with an increase in equipment, staffing, etc. Under a buildout horizon of 80-plus years for the net SAP area and 20 years for the PRSP area, the processing capacities associated with the MRF would likely be adjusted. In the unlikely event that processing capacity is not adjusted, and solid waste generated under cumulative buildout conditions exceeds the capacity of these individual components of the MRF, then these types of waste may need to be hauled elsewhere. But this circumstance is speculative and does not require evaluation in the Draft EIR.



Regarding storage capacity, the TPR indicates that the MRF had a storage capacity of 1,800 tons of unprocessed materials and a storage capacity of the construction and demolition waste and wood and green waste of 2,350 tons. The Draft EIR states (page 4.15-57) that, combined, operation of new uses in the net SAP and PRSP areas would generate 201 tons of solid waste on a daily basis. Therefore, the daily waste generated would consist of 11 percent of the storage capacity. However, as stated in the Draft EIR, the daily waste generated is 36 percent of the available daily permitted processing capacity. If the facility has sufficient storage to achieve its processing capacity and the project's daily waste would consume less of the storage capacity than the processing capacity, then the project would likely have enough storage capacity to serve the project. Also, as discussed above, storage capacity is not a finite resource, and given the long-term buildout of the net SAP area and PRSP area, it is likely that storage capacity would be adjusted. If it is not, then waste may need to be hauled elsewhere; however, as discussed above, this scenario is speculative and does not require evaluation in the Draft EIR.

- 10-4 The comment raises questions related to fair-share funding for solid waste service and odor impacts. Section 4.15 of the Draft EIR, "Utilities," evaluated impacts of the project related to solid waste service capacity and determined that implementing the proposed project would result in less-than-significant impacts, both at the individual project level and at the cumulative level. See response to comment 10-3 for more detail. See Master Response 4: Odors regarding payment of fair-share fees to address odor impacts.
- 10-5 The comment takes issue with the Draft EIR's characterization of significance thresholds related to odors. See Master Response 4: Odors regarding the use of thresholds of significance for the odor impact analysis in the Draft EIR and mitigation measures proposed to reduce significant impacts.
- 10-6 The comment states that the Impact 4.15-11 must be revised to include enforceable mitigation measures, to reduce potential odor impacts that would be directly caused by the reduced landfill buffer zone. This issue is addressed in Master Response 4: Odors.
- 10-7 The comment identifies mitigation measures that the comment suggests would reduce odor-related impacts associated with the WRSL. See Master Response 4: Odors regarding mitigation measures for odor impacts and potential WRSL operational impacts.
- 10-8 The comment states that the Draft EIR should have analyzed an alternative in which the landfill buffer remained in place, with development intensities revised to account for the existing landfill buffer. See Master Response 1: Alternatives Analysis for a general discussion regarding the adequacy of the Draft EIR's alternatives analysis. Master Response 2: Citizen-Initiated Smart Growth Plan describes the constraints related to an alternative design that maintains the 1-mile landfill buffer. As described in the master response, the 1-mile buffer around the centrally located WPWMA property, excludes the entire center of the SAP area, leaving only the corners and edges for development of sensitive land uses (including the Sac State–Placer Center, other schools, and residential land uses). Much of the land in these areas is currently developed with industrial and warehouse uses. In essence, the resulting alternative would closely resemble the 1997 SIA Plan, which is already included in the Draft EIR's alternatives analysis as the No Project Alternative.
- 10-9 The comment suggests that the locations of pipes noted in Figure 4.15-4 and the recycled water pipeline identified in Figure 7 in Appendix B to the Draft EIR are not correct. To clarify, there is no Figure 4.15-4 in the Draft EIR. It is assumed the commenter is referencing Exhibit 4.15-4, Sunset Area Potable Water System. Exhibit 4.15-4 shows a highly conceptual diagram depicting pipeline diameter and general alignment locations to serve proposed development in the SAP area. Potential pipeline alignments were based primarily on existing rights-of-way, and in the absence of rights-of-way, on existing property lines. Within the net SAP area, more specific public rights of ways would be determined at the specific-plan or site-plan stage when those subsequent developments are proposed, and the pipeline alignments would be developed to coincide with those locations.